

1 Do you remember this receipt or -- or can you give
2 me some context about why you had it and why you
3 produced it to us?

4 A I helped prepare the document. Sorry.
5 For the original RFI, I helped prepare the
6 documents and I just gave you -- I just honestly
7 just gave you everything I -- that I had
8 possession of in regards to this investigation.
9 So I have -- I just provided what I had and what I
10 knew --

11 Q Got you.

12 A -- gave to you.

13 Q Do you remember anything else
14 specifically about this receipt? Like, was it
15 ever discussed when you were collecting documents
16 or --

17 A Oh, gosh, I don't. There were so many.
18 I honestly do not recall a specific one. There's
19 so many.

20 Q Yeah. I'm sure. And while we're on the
21 groceries point, do you recall anybody else
22 picking up groceries for -- for the Mooneys?

1 A Not that I can think of. Usually I was
2 the main person to do so just because I was, like,
3 so close.

4 Q So another topic I wanted to talk about
5 is another employee, who, I believe, may have
6 predated you in the office. But do you know who
7 Stephanie Cooper is?

8 A Yes. I do know her. I never personally
9 ever spoke with her. I know of her.

10 Q Okay. And can you tell me what -- tell
11 me what you know about her, I guess.

12 A I know she helped file FEC reports.
13 Like, she was the original accountant type person.
14 I know there was, like, a -- I want to say back in
15 2018, there was a discrepancy with her and she
16 ended up leaving the office. But, yeah. She was
17 like the original -- she would help with -- file
18 FEC reports, prepare FE -- FEC reports, go to
19 expenditures, pick up checks. I'm -- I'm pretty
20 certain she lived pretty close to the congressman,
21 too. So she was, like, easy to get in contact
22 with in regards to campaign work.

1 Q And what is -- what do you know about
2 this discrepancy that you mentioned?

3 A There was an issue she may have took
4 money from the campaign, wrongfully took money
5 from the campaign. Because she had her own debit
6 card, would use it for personal -- for the -- go
7 to the liquor store, grocery store, like, her own
8 personal items. So but I don't know --

9 Q So she was -- so she -- sorry. Go ahead
10 if you were finishing.

11 A Oddly, I don't know many of the details,
12 because she was kind of -- she was dated, but yeah
13 I do know she -- and then she ended up leaving the
14 office and is now working in Maryland, but, yeah.

15 Q And so you believe the way that she was
16 taking campaign money was with the -- the debit
17 card campaign debit card that she had been
18 assigned?

19 A Yeah. And which is one of the reasons
20 why we went the gift card route just to avoid that
21 from happening again because she just was able to
22 just swipe whatever it's -- and then she also

1 handled that DC reports, so she kind of was able
2 to mitigate that, but, yeah.

3 Q Okay. And who did you -- how do you
4 know this? How do -- how did you come to learn
5 about that?

6 A It just came up in conversation. I -- I
7 with the other staffers -- I honestly don't know
8 the -- like specific details, but it just came up
9 in conversation.

10 Q Okay. And do you remember who those
11 conversations were with?

12 A I don't -- I don't.

13 Q Was this pretty widely known?

14 A Yeah, it was kind of, like, you know, we
15 don't really talk about it. It was sort of a dark
16 little piece of campaign history, but, yeah, I was
17 kind of just a so talked to heavily about it.

18 Q Did -- did you ever hear, like, what the
19 total was that she had taken from the campaign or
20 --

21 A Like an upwards of -- I do not know the
22 specific amount but definitely an upwards of like

1 \$20,000 or so.

2 Q Okay. And then do you know anything
3 about else about how -- how when she left. Do you
4 remember or did you ever hear more of an exact
5 date of when she left?

6 A No. I do not know the exact date. I
7 just knew -- I knew she got another job in
8 Maryland, so then she left the campaign for a
9 little bit higher paying --

10 Q Was it 2017 or 2018 --

11 A Oh, sorry.

12 Q -- that she left?

13 A I know she worked during those years. I
14 want to say 2018, was the year she left. From
15 what I can understand.

16 Q Did you ever hear anything about, like,
17 a severance package or any sort of payment to her
18 to not speak about this issue?

19 A No. That I do not know about. Yeah,
20 but I do know she was -- she was questionable in
21 her actions, but no I do not know about a
22 severance package.

1 Q Who do you think would be the most
2 knowledgeable about this situation other than the
3 congressman?

4 A Probably Mike -- Mike or Kelly.

5 Q Do you know when she started working for
6 the congressman?

7 A Oh, gosh, she's been with him for years.
8 I know he -- I believe he's just checked second
9 chiefs. So and -- yeah, the second chief. I -- I
10 only knew him back when he was like my age, Mike
11 was like my age. So they've known each other for
12 a while. I'm not -- I'm not sure of his specific
13 start date though with the (inaudible) yeah. But
14 you know he's (inaudible) --

15 Q And. Got you. And, let's talk about
16 the first review and the first request for
17 information --

18 A Okay.

19 Q -- and the work that you -- the work
20 that you did to help the congressman respond to
21 that. Can you just first just generally describe
22 what your involvement was in that first review?

1 A I was helping, because I knew, like, the
2 receipts were (indiscernible) location, so I was
3 just helping produce. Because I knew you guys
4 were asking for specific receipts like, do you
5 have the receipt for this amount, on this date, to
6 this place? So I would help find them in our
7 filing cabinet and -- scan them and prepare the
8 documents.

9 Q Did you help other than just finding the
10 receipts, did you help figure out the purpose of
11 the expenditures? So when -- when you all
12 produced those documents to us, you had listed
13 like maybe description of the expenditure and the
14 purpose behind it. Did you --

15 A Yes.

16 Q -- help with those also?

17 A Yeah, just because I knew where the
18 receipt may have happened and like the reasoning
19 behind it, so I would help them identify the
20 purpose. And since I was working there at the
21 time.

22 Q And when you were working on that

1 process, did you notice any irregularities or
2 things that concern you about the completeness or
3 accuracy of the congressman's disclosures to my
4 office?

5 A For what -- the only thing I can think
6 of is that if we couldn't find a receipt, I know
7 that would be worrisome, because I know you
8 obviously wanted those documents. So if we
9 couldn't find a receipt, that would be probably
10 the discrepancy I could think of -- the only one.
11 Just -- just due to --

12 Q Did you ever --

13 A -- human error.

14 Q Okay. Yeah. Did you ever hear of or
15 ever see anybody either altering a document or
16 changing a document in some way before it was
17 given to us?

18 A Not me personally, no.

19 Q Okay. There was an issue of -- I guess
20 you guys were using the congressman's calendar as
21 one way to match --

22 A Yeah.

1 Q -- receipts and the purpose of the
2 expenditure; is that right?

3 A Yes -- yes. We used his Google calendar

4 Q Okay. Did you ever notice changes being
5 made to the calendar as you were referring to for
6 the investigation?

7 A No, not particularly. Of course, it was
8 like a long calendar. So I, honestly, may have
9 missed it. Was changed to it to the like a
10 certain purpose. But no, I did not directly see a
11 change being made that would violate the
12 investigation. Okay. It is raining, and my cat
13 is outside. Hold on.

14 Q We can take a -- we can take a
15 five-minute break if you need to go --

16 A No. All good. I'm okay.

17 Q Are you all right? Okay.

18 A Yeah. Okay.

19 Q No worries. I wanted to ask you about
20 some specific charges that showed up on
21 Representative Mooney's bank account -- or --
22 sorry, not his bank account, the campaign bank

1 account. And maybe you can tell me if you know
2 anything about these. Sean, can you pull up tab
3 four and you can mark that as Exhibit D. Okay.
4 So if we scroll down, Sean, are you controlling
5 the screen? Okay. Can you scroll down to --
6 there's dates on the left. I think it's the
7 fourth page. That's 130. Yeah, that's great.
8 You can zoom in a little bit. Can you see that,
9 Former Staffer 3?

10 (Exhibit D was marked.)

11 A Yeah.

12 Q Okay. So this exhibit is a printout of
13 some of the charges to the campaign card. Have
14 you seen this sort of document before? This is
15 from the Bank of Charles Town?

16 A Yes -- yes.

17 Q Okay. And these are for expenditures in
18 late January. Sean, can you scroll up a little
19 bit so I can see the year 20 -- I think these ones
20 are 2017. But throughout and over the years, if
21 you scroll down again a little Sean, there's these
22 charges for West Virginia Park. \$20 on 130 and

1 then on 131, there's another one, West Virginia
2 Park, \$40. Do you have any idea what those
3 expenditures are for?

4 A I do not know what that is.

5 Q Okay. Was there a -- was -- was there,
6 like, a state park or -- and when I say that, you
7 know, like, a natural park, like -- like --

8 A Like you pay to (inaudible.)

9 Q -- like to get into a park, yeah,
10 nearby?

11 A I -- I mean, yes, I can assume so, but
12 not one where I could match that charge with.

13 Q Okay.

14 A I know the park he would go to but he
15 would go to, but I don't think you had to pay it
16 again into that one.

17 Q Okay. Got you. Another witness that
18 said that potentially it was a park that either
19 Grace or the congressman and Grace took Tammy to?
20 Was there --

21 A Okay.

22 Q -- like a state park that they

1 frequently took your daughter to?

2 A No, that I know of. I know there's this
3 one park he would go to with the younger one, but
4 that wasn't -- you don't pay it again to that one.
5 That would overlook Harpers -- not Harpers Ferry,
6 but, like, the Potomac. But, yeah, no.

7 Q Okay. I also wanted to ask you a little
8 bit about -- so there were some in the first
9 review where were some leaks to the press about
10 specific aspects of -- of things that my office
11 was asking about and then later of the report that
12 my office wrote?

13 A Yes.

14 Q Do you know -- do you know anything
15 about those or know who --

16 A I do know that.

17 Q -- any officer that was speaking to the
18 press.

19 A Yes. I came to find out it was --
20 [Former Staffer 6]. He's our former legislative
21 course. But yes. I do know there about those
22 leakings after they happened and were found out.

1 Q Okay. And do you know if anybody else
2 was speaking to the press around that time?

3 A No -- no. And, actually, now that I'm
4 thinking about one of my answers, for the
5 Stephanie Cooper issue, I honestly, I think Ted
6 Dacey. Do you know Ted Dacey?

7 Q I know who that is. Excuse me.

8 A He probably -- yes, he probably be the
9 best person for that one. Because I remember he
10 brought it -- he was the one that brought it up
11 like briefly when we were just going through like
12 an FEC report. But that would probably be the
13 best person because he like directly handled these
14 reports. Mike was more like a supervisor, but he,
15 like, directly handled those.

16 Q Okay. And do you know if Ted -- was Ted
17 around at the time when Stephanie was working?

18 A Yeah.

19 Q For the record.

20 A Yes, he was.

21 Q Okay. That's helpful. Thank you. I
22 can't remember, is Ted still employed by the

1 congressman?

2 A No. He's not. He left on December. He
3 left like right when I got on as an intern.

4 Q You know where he is now?

5 A He is at Targeted Victory, which is like
6 a media.

7 Q Great. Let's take a five-minute break.
8 I'm just going to look over my notes and then I
9 think we're almost done.

10 A Okay.

11 MR. QUINN: So let's -- let's go off the
12 record, Ashby. And then let's come back at 11: 25
13 AM.

14 (Whereupon, a discussion was held off
15 the record.)

16 BY MR. QUINN:

17 Q Okay. Yes, I think -- actually, I
18 basically gotten through everything I wanted to
19 talk to you about.

20 A Okay.

21 Q I just wanted to give you a second in
22 case there's anything that you were hoping we were

1 discussed today, or you think that we should
2 discuss.

3 A I think honestly, I think we're good. I
4 was surprised, I think we -- I think we touched
5 everything that I can think of, so --

6 Q Okay. Well, again, thanks very much for
7 your time. I think we can be out of your hair now
8 and well, you won't have to hear from us again.

9 A No worries, no worries. You guys have
10 een nice.

11 MR. QUINN: Well, okay. I'm glad to
12 hear it. Yeah. Let's go through spellings real
13 quick. First off, Former Staffer 3, if you can
14 stick around for one minute just to make sure that
15 if you might be able to help us with some spellings.

16 (Off the record at 11:27 a.m.)
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CERTIFICATE OF COURT REPORTER

I, Ashby Everhart, the officer
before whom the foregoing proceedings were taken,
do hereby certify that said proceedings were
electronically recorded by me; and that I am
neither counsel for, related to, nor employed by
any of the parties to this case and have no
interest, financial or otherwise, in its outcome.

Notary Registration No.: 7844371

My Commission Expires: 12/31/2023



Ashby Everhart, Court Reporter

CERTIFICATION OF TRANSCRIPT

I, Andrew Hatziyannis, do hereby certify that the foregoing transcript, to the best of my ability, knowledge, and belief, is a true and correct record of the proceedings; that said proceedings were reduced to typewriting under my supervision; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.



Andrew Hatziyannis
Planet Depos, LLC
November 11, 2021

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

ERRATA SHEET

Page	Line	Correction	Reason
7	15	"of 2019"	Pinpoint time in office
8	10	"'20"	Pinpoint timeframe
8	12	"December, 2019"	Pinpoint timeframe
8	18	April 2020 until July 2020	Pinpoint timeframe
8	22	"April 2020"	Pinpoint timeframe
19	2	"Walkersville"	Only former staffer who went to this city
22	1	[REDACTED]	Name
22	5	[REDACTED]	Name
27	9	"2020"	Pinpoints my timeframe
28	15	"Renee"	Pinpoints time
53	8	"2020"	pinpoints time
70	11 13	'20 . 2020.	pinpoints time
8	11	"So 2020?"	pinpoints time
11	3	"Northern"	Pinpoints my location
13	110	Hannah Mansell	Name
57	13	"9/6/2020, 2020"	pinpoints time

This errata sheet is submitted subject to 18 U.S.C. § 1001 (commonly known as the False Statements Act).

Witness Name:

Witness Signature:

Date:

11/22/2021

EXHIBIT 4

Transcript of Interview of Former Staffer 4

Review No. 21-6998

September 24, 2021

OFFICE OF CONGRESSIONAL ETHICS OF THE
U.S. HOUSE OF REPRESENTATIVES

In re: FORMER STAFFER 4,) OCE Review No:
_____) 21-6998

Interview of FORMER STAFFER 4
Conducted Virtually
Friday, September 24, 2021
10:01 a.m. ET

Job No.: 400471

Pages: 1 - 52

Reported by: Timothy R. Yancey, Notary Public

1 Interview of FORMER STAFFER 4, conducted
2 virtually.

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8 Pursuant to notice, before Timothy R. Yancey,
9 Notary Public in and for the State of Maryland.

1 A P P E A R A N C E S
2 ON BEHALF OF OFFICE OF CONGRESSIONAL ETHICS:
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21 ALSO PRESENT:
22 DELANEY SCHUELER, RVC TECHNICIAN

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E X H I B I T S

(Attached to the transcript)

FORMER STAFFER 4 INTERVIEW EXHIBITS:	PAGE
Exhibit A ALEC Contacts	21
Exhibit B Flyer Invite	24
Exhibit C Invite List Attached	45
Exhibit D Draft Invite List	46
Exhibit E B-List	49

Transcript of Interview of Former Staffer 4
Conducted on September 24, 2021

5

1 P R O C E E D I N G S

2 MR. QUINN: For the record, today is
3 September 24th, 2021, and we're conducting the
4 interview of FORMER STAFFER 4 -- am I
5 pronouncing your last name correctly?

6 FORMER STAFFER 4: Former Staffer 4. Close.

7 MR. QUINN: -- Former Staffer 4 by Zoom.
8 Former Staffer 4 is not represented today. Speaking is Sean
9 Quinn, Investigative Counsel at the Office of
10 Congressional Ethics, and I'm here with Annie Cho,
11 who is also at the OCE.

12 The witness has been given a copy of 18
13 USC 1001, and has signed the acknowledgment. And,
14 actually, while I'm on that topic, did you have
15 any questions about the False Statements Act
16 acknowledgment or anything?

17 FORMER STAFFER 4: Uh-uh. None. Very
18 straightforward.

19 MR. QUINN: Yes. Pretty straightforward,
20 yes. And then also, like I said earlier but I'll
21 just say one more time, thanks so much for being
22 here today, and for giving us some of your time.

1 We really appreciate it. And then, as I said
2 before, but I'll just repeat one more time, I'm
3 happy to answer any questions you have throughout
4 this interview. So feel free to stop me at any
5 point for a question, or if you need to go get
6 some water or take a bathroom break, or if a
7 question I ask you isn't clear, I can re-word it,
8 or repeat it for you. Just let me know.

9 And then as Delaney said, the court
10 reporter will be transcribing everything that
11 we're saying.

12 FORMER STAFFER 4: Uh-huh.

13 MR. QUINN: And a lot of times when you're
14 in conversation, you start talking quickly, and
15 speaking over each other. So let's just try to do
16 the best we can to let each other stop the
17 statements, and then not to speak over each other
18 for the transcriptionist.

19 FORMER STAFFER 4: Yes.

20 MR. QUINN: Okay, great. Well, then with
21 that, I'd like to start with just a little bit of
22 background information. So if you could tell me

1 how you began working for Representative Mooney,
2 that would be great.

3 FORMER STAFFER 4: Yes. So I got hired on
4 as a staff assistant in Congressman Mooney's
5 office. This was 2018, and I think it was, like,
6 March or April-ish, and then I ended up putting in
7 my resignation at the end of June of that same
8 year.

9 MR. QUINN: Okay. And how did you come to
10 apply for that job?

11 FORMER STAFFER 4: So I am pretty sure
12 that I applied on ConservativeJobs.com. I think
13 it's a website that the Leadership Institute runs.

14 MR. QUINN: Okay. And so you didn't have
15 any connection to Representative Mooney before
16 that?

17 FORMER STAFFER 4: No. No, no, no. I'm
18 not from West Virginia. I'm from New York City,
19 so definitely no connection whatsoever.

20 MR. QUINN: Okay. And then your title was
21 staff assistant you said?

22 FORMER STAFFER 4: Uh-huh. Staff

1 assistant -- (inaudible.)

2 THE REPORTER: I'm sorry. One more time.
3 I didn't hear that.

4 FORMER STAFFER 4: Staff assistant/intern
5 coordinator. Sorry.

6 THE REPORTER: Got it. Thank you.

7 MR. QUINN: Okay. And then did you have
8 any other titles while you were there?

9 FORMER STAFFER 4: Uh-uh.

10 MR. QUINN: Okay. If you could just
11 describe your responsibilities in that position.

12 FORMER STAFFER 4: Yes. So, obviously,
13 basic staff assistant duties: Scheduled White
14 House tours, Capitol tours, any other tours. That
15 was, I think, like the FBI. Help with, like,
16 Supreme Court tours. I did help the
17 communications director quite a bit with just
18 social media postings, and updating the Twitter
19 and Facebook page. I did write an op-ed once for
20 the congressman for, I think, the local paper. I
21 don't know if that ever got published or anything.
22 And then other than that, it was pretty much

1 manage my interns. Yes.

2 MR. QUINN: Okay. You mentioned that you
3 gave tours or helped coordinate tours?

4 FORMER STAFFER 4: Uh-huh.

5 MR. QUINN: Do you know who -- or was it
6 constituents that you were giving tours to?

7 FORMER STAFFER 4: So I personally never
8 gave a tour, but all of the Capitol tours,
9 obviously, were done through, like, the server
10 that I -- I can't remember it was literally so
11 long ago. I would schedule those. So I believe
12 they were mostly constituents. I know that there
13 was one time -- I think it was on a weekend, it
14 was like a Saturday or a Sunday -- that I was
15 working with the congressman, and the scheduler at
16 the time to put together this massive Capitol
17 tour, and I don't remember exactly who it was. I
18 don't know if they were constituents, or who they
19 were but, if I recall, it was quite a large group
20 of, like, 25 to 15 people.

21 I had to send my interns out to go, you
22 know, obviously, to give the tour. I wasn't

1 available that weekend. Yes.

2 MR. QUINN: Okay, great. And then who did
3 you report to in your role at Representative
4 Mooney's office?

5 FORMER STAFFER 4: So, for most of my time
6 there, I reported to the scheduler, and then my
7 last two weeks in the office, I was reporting to
8 the LD.

9 MR. QUINN: Okay. And who are those two
10 people?

11 FORMER STAFFER 4: Kate Morgan was the
12 scheduler at the time. I believe she got married,
13 so that's not her last name anymore. And then the
14 legislative director was Scott Roush.

15 MR. QUINN: Okay. And then I presume the
16 interns reported to you. Did anybody else report
17 to you?

18 FORMER STAFFER 4: So the interns kind of
19 reported to me. They also kind of reported to
20 Kate as well.

21 MR. QUINN: Okay. And then was
22 [Former Staffer 6] one of the interns at that time?

1 FORMER STAFFER 4: Yeah.

2 MR. QUINN: Okay. And then do you recall
3 any of the other interns?

4 FORMER STAFFER 4: Yes. So one, Ashley
5 Christopher. The other two, it was Jonathan --
6 I'm connected with them on LinkedIn. Do you mind?
7 Can I look up their names for you?

8 MR. QUINN: No, I don't mind. Yes.

9 FORMER STAFFER 4: Matthew Harris is one
10 of my other interns, and then -- goodness. I
11 can't remember his last name. It was Jonathan
12 Partamian.

13 MR. QUINN: Can you spell that real quick?

14 FORMER STAFFER 4: Yes. It's
15 P-A-R-T-A-M-I-A-N.

16 MR. QUINN: Okay, great. So then other
17 than the interns, and then we talked about
18 Kate Morgan briefly, is there anybody else that
19 you worked closely with in the office?

20 FORMER STAFFER 4: What do you mean
21 exactly by, Closely?

22 MR. QUINN: Just somebody that you

1 interacted with frequently, or maybe you worked on
2 projects with.

3 FORMER STAFFER 4: So the chief of staff
4 was one. He had me scheduling, like, one-on-one
5 meetings for him. Obviously, the communications
6 director at the time, Ted Dacey. He was also the
7 deputy chief as well, and that was pretty much it.
8 There was the LA, but I didn't really do a lot of
9 legislative work, John Caddock. So it was kind
10 of -- you know, we were just co-workers but not
11 much, like, work-related interactions there.

12 MR. QUINN: Okay. And the chief of staff
13 at the time was Michael Hough?

14 FORMER STAFFER 4: Correct.

15 MR. QUINN: Okay. And then so I think you
16 said you started around March or April and then
17 left in June. Can you tell me about why you left?

18 FORMER STAFFER 4: It was just not a very
19 good environment. I was just not happy with how I
20 was being treated specifically, actually, by the
21 scheduler. There was a lot of head-butting, a lot
22 of -- I mean, to be frank, it was a lot of

1 bullying on behalf of the scheduler and the LA.

2 MR. QUINN: Is that -- sorry. The
3 scheduler was Kate Morgan at the time?

4 FORMER STAFFER 4: Uh-huh. Yeah, Kate and
5 John. So I was just not comfortable working in
6 that office anymore. I was just not. It was just
7 not a good situation for me, so for the sake of my
8 mental health, I just had to put in my two weeks
9 and call it a day.

10 MR. QUINN: Okay. Can you describe to me
11 what you mean when you say, Bullying?

12 FORMER STAFFER 4: It was a lot of having
13 my interns send screen shots of conversations in
14 an attempt to, you know, get me in trouble. It
15 was a lot of, you know, sly remarks, a lot of just
16 very passive/aggressive behavior, a lot of -- on
17 top of that, it was also a lot of micro-managing,
18 just a lot of not trusting me to do my job. I had
19 went to the chief of staff, I think, two weeks in,
20 and I said this is a problem, I'm not being
21 treated correctly. And it was temporarily
22 resolved, and then all of a sudden, it got really

1 bad again. So for the sake of my mental health, I
2 just had to call it quits.

3 MR. QUINN: Okay. And what sorts of
4 things did you feel like they were trying to get
5 you in trouble for?

6 FORMER STAFFER 4: So I will say I had a
7 text message with my interns, and I think -- I'm
8 from New York City. I swear like a sailor. And
9 in no way, shape, or form -- I had a very good
10 relationship with all of my interns. I got in
11 trouble for -- in a text message, I think I had
12 written, like -- I think I wrote to them, you all
13 are smart, you all can fucking figure this shit
14 out. And it was in no way -- again, like, I had
15 hung out with my interns. Like, you know, this
16 was like we hung out on the weekends. It was a
17 very casual conversation.

18 I got a formal reprimand for that screen
19 shot of the text messages. And, at that point,
20 I -- I was kind of already out the door at that
21 point. It was -- like, I explained to the chief,
22 like, okay, I admit it was unprofessional for me

1 to curse to the interns, but the type of
2 relationship that we had, like, they would swear,
3 I would swear. It was never, like, I was berating
4 them for being incompetent or incapable.

5 And so once that happened, I realized at
6 that point kind of what was happening. I knew the
7 intern who had sent in the screen shot of those
8 text messages, and I just was not comfortable
9 anymore. There were a lot of conversations that I
10 would have, you know, in private with them as
11 well. And it was like, okay. Well, I could be
12 having a confidential conversation with you, and
13 I'm hoping that you're not going and telling
14 everyone this, that I -- the trust was just lost
15 at that point.

16 MR. QUINN: Right. Okay. Do you recall
17 who that intern was that had sent the screen shot?

18 FORMER STAFFER 4: [Former Staffer 6].

19 MR. QUINN: Okay. And other than that
20 incident, how would you describe your relationship
21 with [Former Staffer 6]?

22 FORMER STAFFER 4: After that -- I mean,

1 for the most part, I thought we were fine. Like,
2 again, we would hang out. We would joke around.
3 I would help them with tasks and things like that.
4 It was very cordial, and then up until that
5 moment, I kind of just realized there was just no
6 trust there. So I spent the last week-and-a-half,
7 it would be good morning, good-bye, you know, and
8 come to me if you need anything at work. But,
9 other than that, it was, you know, no more casual
10 fun conversation between the two of us.

11 MR. QUINN: Right. Okay. And then could
12 you just tell me quickly. What did you do after
13 you left Representative Mooney's office?

14 FORMER STAFFER 4: Yes. So I worked for,
15 like, a campaign company that's based out in Ohio
16 called Strategy Company/Front Porch Strategies.
17 So I had been working there part-time since
18 college, and they -- I actually went to my boss
19 and explained to him the situation in Congressman
20 Mooney office. And he said, well, we need someone
21 for the campaign season, do you want to come on.
22 So that's it.

1 MR. QUINN: Okay. And is that where you
2 are now?

3 FORMER STAFFER 4: No, not currently. I'm
4 with a lobbying firm downtown, Mehlman,
5 Castagnetti, Rosen & Thomas.

6 MR. QUINN: That's right. Okay. And then
7 did you hold any positions between the event firm
8 in Ohio and the lobbying firm now?

9 FORMER STAFFER 4: Yes. So I also worked
10 at FreedomWorks briefly for three months. Oh.
11 And I also worked in Congressman Thompson's office
12 as well for a month as his scheduler.

13 MR. QUINN: Okay. Great. Let's talk
14 about the birthday party that I think you helped
15 plan in 2018.

16 FORMER STAFFER 4: Uh-huh, yeah.

17 MR. QUINN: Why don't we start with you
18 just kind of generally telling me about that
19 event, and then I'll dig into some more specific
20 questions after you give me kind of an overview.

21 FORMER STAFFER 4: Yes. So the
22 congressman brought me into his office one day,

1 and he was like, hey, my birthday is coming up, I
2 want to throw a birthday party, I'm going to put
3 you in charge of RSVPs, getting the food, and just
4 kind of, you know, helping me organize all of
5 this. Of course, I said okay. I was given the
6 invite list that was put together by the
7 congressman and chief, Michael Hough.

8 And so from there, I mean, I sent out the
9 invites, I kept track of the RSVPs. The day of
10 the event, I picked up -- my interns actually
11 helped me as well. We picked up all the food. We
12 picked up the cigars. I can't remember if we
13 served drinks, or if someone brought that. We
14 ordered pizza as well, and got that delivered.
15 And then during the event, we were kind of -- my
16 interns and I were kind of in charge of, like,
17 escorting everyone up to the Speaker's Balcony.

18 And then from there, I mean, I pretty much
19 just took pictures of the event and hung out with
20 my interns, just kind of getting some food and
21 relaxed.

22 MR. QUINN: Okay. And was planning that

1 sort of event part of your regular duties, or was
2 this sort of a stand-out occurrence?

3 FORMER STAFFER 4: I would say it was a
4 one-time thing. He'd just said -- yeah. That was
5 like the only big event that he ever had me plan
6 was that birthday party.

7 MR. QUINN: Okay. Let's talk a little bit
8 about the invite list.

9 FORMER STAFFER 4: Uh-huh.

10 MR. QUINN: Can you tell me, generally,
11 what sorts of folks were invited to the birthday
12 party?

13 FORMER STAFFER 4: Yes. So I sat in on a
14 conversation, and it seemed like it was comprised
15 of, like, previous donors, and -- I mean, mainly
16 just previous donors. I don't know if he invited
17 friends. I remember the congressman making one
18 quick comment about one individual and who it was.
19 And he was like, oh, he didn't donate to me last
20 cycle so, like, we can put him on our B-list.

21 MR. QUINN: Okay. And you said you think
22 it was Mr. Hough and Representative Mooney that

1 kind of came up with the first draft of that list?

2 FORMER STAFFER 4: Uh-huh.

3 MR. QUINN: So in addition to donors or
4 past donors, how about other people on the Hill?
5 Do you know if any either staffers or Members were
6 invited.

7 FORMER STAFFER 4: So Congressman Scalise
8 showed up briefly to say hello.

9 MR. QUINN: Okay. And then how about
10 staffers, either in Representative Mooney's office
11 or other staffers on the Hill?

12 FORMER STAFFER 4: So I was there.
13 Obviously, the chief was there. My interns were
14 there. Kate was there. John Caddock was there as
15 well. Ted was there. In terms of other Hill
16 staffers, honestly, I can't remember. I don't
17 think so. I spent most of the evening talking to
18 Scott Roush's wife.

19 MR. QUINN: Okay. All right. And just to
20 kind of go over that one more time. So other than
21 donors, it sounds like, as far as you can recall,
22 Representative Scalise, and then a few folks from

1 Representative Mooney's office; is that correct?

2 FORMER STAFFER 4: Yeah.

3 MR. QUINN: Okay. And then I just wanted
4 to ask you. You know, we received documents from
5 you, and I looked through those. I wanted to ask
6 you about one of them.

7 FORMER STAFFER 4: Uh-huh.

8 MR. QUINN: Delaney, can you pull up
9 Tab 2?

10 THE TECHNICIAN: Okay. And what did you
11 want me to mark this as?

12 MR. QUINN: You can mark this as
13 Exhibit A.

14 THE TECHNICIAN: Okay. Standby.

15 (Former Staffer 4 Interview Exhibit A was
16 marked for identification, and attached to the
17 transcript.)

18 MR. QUINN: Former Staffer 4, can you see that
19 e-mail?

20 FORMER STAFFER 4: Yeah.

21 MR. QUINN: Okay. All right. I think
22 this is probably just a typo, or maybe a

1 voice-to-text thing. Is ALEC -- A-L-E-C, and then
2 a capital A -- actually a person? This is an
3 e-mail from Michael Hough to you sent on 5/29/2018
4 at 2:02 p.m., and the subject of the e-mail is
5 ALEC, A-L-E-C, contacts. Is that supposed to
6 Alex? Was that a typo, or is that like a
7 database?

8 FORMER STAFFER 4: So that's the
9 organization, ALEC.

10 MR. QUINN: Okay.

11 FORMER STAFFER 4: I think Michael Hough
12 used to work there, or has some sort of
13 association with them.

14 MR. QUINN: Okay. Do you know what that
15 stands for?

16 FORMER STAFFER 4: I don't.

17 MR. QUINN: Okay.

18 FORMER STAFFER 4: I can Google it and
19 find out. It's some conservative/libertarian
20 organization.

21 MR. QUINN: Okay. And do you know --
22 American Legislative Exchange Council, does that

1 sound --

2 FORMER STAFFER 4: Yeah, I think that's
3 it.

4 MR. QUINN: -- like that might be it?
5 Okay. Do you know why he would have been inviting
6 folks from ALEC?

7 FORMER STAFFER 4: No. I mean, other
8 than, I think -- like I said, I think that he had
9 worked there previously, and just had
10 relationships with folks that still worked there.

11 MR. QUINN: Okay. And that's
12 Michael Hough had worked there?

13 FORMER STAFFER 4: Uh-huh.

14 MR. QUINN: Okay, got you. And then was
15 there some sort of database of ALEC contacts that
16 you had accessed? Do you recall this e-mail, I
17 guess I should ask first?

18 FORMER STAFFER 4: I mean, yes, because I
19 just saw it when I sent it over to you. I'm not
20 sure what log-in information that he was referring
21 to.

22 MR. QUINN: All right. Then we can take

1 that Exhibit off of the screen. Thanks. That's
2 helpful. I thought maybe ALEC was just like a
3 voice-to-text issue.

4 FORMER STAFFER 4: Totally understandable.
5 (Laughter.)

6 MR. QUINN: And then just to have you
7 confirm that I'm understanding this document
8 correctly, can you -- Delaney, can you pull up
9 Tab 4?

10 THE TECHNICIAN: Okay. And do you want to
11 mark this as Exhibit B?

12 MR. QUINN: Yes. Let's do that.

13 THE TECHNICIAN: All right. Standby.

14 (Former Staffer 4 Interview Exhibit B was
15 marked for identification, and attached to the
16 transcript.)

17 MR. QUINN: And can you scroll down just a
18 little bit, Delaney? That's it. Yes, cool.

19 So this is another document that you
20 produced to us. We applied our own Bates
21 Numbering or numbering system to the document, so
22 the Bates Number for this document is AS_0001.

1 And this looks like, obviously, the flyer or
2 invite for the birthday party?

3 FORMER STAFFER 4: Yep.

4 MR. QUINN: Okay, great. And so the
5 birthday party was held on the Speaker's Porch; is
6 that right?

7 FORMER STAFFER 4: Correct.

8 MR. QUINN: Okay. I guess the Speaker's
9 Balcony, not Speaker's Porch. Okay. Great. And
10 so I'll also confirm. So it was June 7th. It
11 looks like that was a Thursday, and it was held
12 around 6:00 p.m.?

13 FORMER STAFFER 4: Uh-huh.

14 MR. QUINN: And do you remember how late
15 the event went?

16 FORMER STAFFER 4: I don't. Maybe -- I
17 remember it being dark when I left, so maybe like
18 8:00/9:00.

19 MR. QUINN: Okay. And then did you or
20 other interns help with cleaning up the event?

21 FORMER STAFFER 4: I'm sorry? Putting up
22 the event?

1 MR. QUINN: Did you, or the interns, or
2 anybody else help with cleaning up the event.

3 FORMER STAFFER 4: Yep. Yeah.

4 MR. QUINN: I want to get sort of an
5 understanding of how much time you spent on this
6 event, and sort of when you were working on it.
7 So the first question -- and I know this might be
8 difficult to answer -- but could you guess about
9 how much time you spent, hours, how many hours you
10 spent planning this event?

11 FORMER STAFFER 4: Honestly, I mean, per
12 week, maybe like an hour or two. Maybe between
13 the time it took to draft the invite, get that
14 approved, and just keep track of everything,
15 anywhere from one to three hours a week, maybe,
16 for like the three weeks leading up to it.

17 MR. QUINN: Okay. And how about other
18 staff time, so the interns, or Kate's time? Could
19 you just ballpark for me how much time they spent?

20 FORMER STAFFER 4: I don't know about Kate
21 because all I know was that -- sorry about that.
22 My boss just texted me.

1 MR. QUINN: Okay.

2 FORMER STAFFER 4: Yeah. I don't know
3 about Kate. As for the interns, I mean, all they
4 did was the date of the event, I just needed help
5 picking up the food and things like that. So,
6 like, they came with me over to the Harris Teeter
7 that's at Navy Yard. And maybe that's for an
8 hour-and-a-half, I think, to pick everything up.
9 And then I went by myself to go pick up the cigars
10 in Union Station.

11 So it was -- I mean, I guess it was
12 mostly -- it took the most of my time more than
13 anyone else's.

14 MR. QUINN: Okay. And then do you know
15 how the event was paid for?

16 FORMER STAFFER 4: So I don't. I was
17 given a credit card, and I don't know if it was a
18 personal credit card, or what account that was
19 hooked up to.

20 MR. QUINN: Okay. I also want to talk a
21 little bit about how the event was kind of
22 described or categorized. I know you said that

1 the invite list was mostly donors or prior donors.
2 Did you consider this a fundraising event?

3 FORMER STAFFER 4: I mean, I didn't think
4 it was just because with my e-mail language, it
5 was, you know, oh, I'm inviting you as a thanks
6 for your friendship over the years. I mean, it
7 didn't really occur to me that because they was
8 inviting donors that it was a fundraiser of any
9 sort. So I also just -- as someone who was so new
10 to the office, I didn't know what -- I mean,
11 outside of donating, I don't know if the
12 congressman actually did have a relationship or a
13 friendship with these people that he was inviting.
14 I wasn't necessarily in a position to ask.

15 MR. QUINN: Right.

16 FORMER STAFFER 4: You know, I was just
17 kind of given this task. And it just kind of was
18 like, okay. I don't know if you can necessarily
19 say no to a congressman.

20 MR. QUINN: Right. Okay. So as far as
21 you know, there was no money exchanged in order to
22 attend the event, or in connection with the event?

1 FORMER STAFFER 4: Correct, yeah.

2 MR. QUINN: Did anybody ever describe it
3 as a fundraiser or use similar terminology to
4 that?

5 FORMER STAFFER 4: No, but -- I don't know
6 if I mentioned it to you. I was contacted, like,
7 four or five months ago by a -- I think it was a
8 reporter for The Hill who wanted to run a story on
9 this event. And I think that was the first time
10 that I ever -- like, anyone ever mentioned to me,
11 or that I would have -- you know, that something
12 might have happened at this event.

13 MR. QUINN: Okay. If you don't mind
14 telling me, who was that reporter?

15 FORMER STAFFER 4: I honestly don't
16 remember. I think I literally deleted the e-mail
17 because, obviously, in that position, I'm not --
18 given my relationship with that office, I just
19 wasn't comfortable speaking with that reporter.

20 MR. QUINN: Right.

21 FORMER STAFFER 4: I was still living in
22 D.C., and, obviously, these are kind of tough

1 situations to be in. So I just decided to just
2 not speak with him. I mean, I can dig through my
3 e-mails and try to find it.

4 MR. QUINN: I might be able to give you a
5 name. Do you think you would recognize his name?

6 FORMER STAFFER 4: Maybe.

7 MR. QUINN: Was it Chris Marquette?

8 FORMER STAFFER 4: Possibly. Maybe.

9 MR. QUINN: Okay. We don't need to worry
10 about that. Then just generally on the event,
11 anything else that we haven't kind of talked about
12 in connection with the birthday party that either
13 seemed odd to you, or that you think we should
14 talk about today?

15 FORMER STAFFER 4: No.

16 MR. QUINN: Okay. Great. Then I know you
17 also -- in our request to you, we asked about use
18 of staff time for personal errands.

19 FORMER STAFFER 4: Uh-huh.

20 MR. QUINN: And you provided me with a
21 short list of a couple of responsibilities that
22 you had in your time at the congressman's office,

1 so I wanted to go through those. We can talk
2 about those, and then maybe see if there's
3 anything else to add to the list.

4 FORMER STAFFER 4: Uh-huh.

5 MR. QUINN: So in that e-mail, you told me
6 that one of your responsibilities was to pick up
7 and drop off the congressman's dry cleaning?

8 FORMER STAFFER 4: Uh-huh.

9 MR. QUINN: Can you just describe that
10 sort of set of responsibilities to me?

11 FORMER STAFFER 4: Yeah. So it was at the
12 end of every -- like out-of-session week, he would
13 have his bag of dirty laundry to bring down to the
14 dry cleaners. I would bring it down there.
15 Whenever it was ready -- it was usually that
16 following Monday or Tuesday -- I would just go
17 pick up the dry cleaning, and bring it back, and
18 make sure that it was hung up in that back hallway
19 at his little kitchen area.

20 MR. QUINN: Okay. And that's in the
21 congressional office?

22 FORMER STAFFER 4: Yes.

1 MR. QUINN: Okay. And then where did he
2 send the dry cleaning to?

3 FORMER STAFFER 4: The dry cleaners that's
4 in Longworth, I think.

5 MR. QUINN: Did you ever run any other
6 errands related to his clothes, like pick up
7 clothes for him somewhere, and bring them to he
8 office, or anything else along those lines?

9 FORMER STAFFER 4: I had to bring him his
10 running shoes once when he was at the Member's
11 House gym. I had to run his sneakers down to him
12 once, but that was it.

13 MR. QUINN: Okay. And you picked up the
14 sneakers where?

15 FORMER STAFFER 4: I think they were in
16 his office. I think they were in his office.

17 MR. QUINN: Okay. So you just brought him
18 the sneakers from his congressional office to the
19 gym?

20 FORMER STAFFER 4: Yes.

21 MR. QUINN: Okay. Do you know of anybody
22 else that had any responsibilities, or that you

1 heard of running errands related to his laundry or
2 clothing?

3 FORMER STAFFER 4: So when I first got
4 hired on, I got hired over an intern that they
5 currently had who went for the staff assistant's
6 position. And I know he, for a period of time
7 before he left, was -- I don't know. I can't
8 remember if he was doing his dry cleaning
9 temporarily, but I do remember that he was like,
10 oh, I can get the congressman's snacks for him on
11 fly-in days.

12 So I know he did that, and then the
13 responsibilities got transferred over to me.

14 MR. QUINN: Say that one more time. Get
15 the congressman's what on fly-in days?

16 FORMER STAFFER 4: Oh. His snacks on
17 fly-in days.

18 MR. QUINN: Snacks. Okay.

19 FORMER STAFFER 4: Yes. I think Kate had
20 to watch the congressman's daughter once, like,
21 briefly, because I think maybe he had to go vote
22 or something.

1 MR. QUINN: And where did she watch his
2 daughter?

3 FORMER STAFFER 4: I think she was in the
4 congressman's office.

5 MR. QUINN: Okay. You just mentioned the
6 snacks. So in that e-mail you sent to me
7 summarizing some of your responsibilities, you
8 said, On fly-in days, I had to purchase snacks for
9 him and have them ready in his fridge; if I didn't
10 handle it, or wasn't able to, an intern would.
11 Can you just go into a little more detail about
12 that set of responsibilities?

13 FORMER STAFFER 4: Yes. So every fly-in
14 day, I go down to Longworth Cafeteria, and if I
15 recall correctly, it was very -- it was like I had
16 to pick up two cartons of milk, like a small,
17 little plastic container of the mixed fruit, I
18 think two to three yogurts, and then maybe a
19 banana or two. So, obviously, I put the all of
20 that in his fridge, and just made sure that it was
21 ready for him for when he arrived, say, around
22 5:00 he would get into D.C.

1 MR. QUINN: Okay. And that was his fridge
2 in the congressional office?

3 FORMER STAFFER 4: Correct.

4 MR. QUINN: And then the last and third
5 responsibility that you detailed in your e-mail
6 was you said you renew or returned library books
7 to the Library of Congress for a member of the
8 congressman's family. And you said, I know her
9 name, I just can't remember exactly who she is.
10 Who was that?

11 FORMER STAFFER 4: Grace.

12 MR. QUINN: Grace, okay. And just tell me
13 a little bit about that. How often did that
14 occur?

15 FORMER STAFFER 4: It was every couple of
16 weeks. I mean, she'd want to take out books, so I
17 had to get them ordered. And I'm pretty sure the
18 Library of Congress delivers them to the office,
19 and picks them up from the office. You just have
20 to coordinate all of that. So that's just kind of
21 what I did, and I think there was only two or
22 three times. So I was only there, I think, for

1 three, three-and-a-half months. It was only two
2 or three times that I was having books delivered
3 and had books picked up.

4 MR. QUINN: Okay. Were there any other
5 family members that you remember doing tasks for
6 or being contacted by?

7 FORMER STAFFER 4: His mother. The
8 congressman's mother, Lala. I think I had to help
9 her once. She likes going around the district. I
10 remember being told this. She really likes going
11 around the district and making sure that she is,
12 like, prepared to give contact info or something
13 like that to constituents because she's really
14 proud of her son. So I think I had to help her
15 put together some sort of mini flyer. I don't
16 know if I ever actually got that task done,
17 though, but I know it started.

18 MR. QUINN: Okay. And do you mean contact
19 info for the congressman?

20 FORMER STAFFER 4: Yeah. It was like his
21 office number, things like that, how to schedule a
22 Capitol tour. So I think I did get it done. It

1 was like towards the tail end of my time there.

2 MR. QUINN: So she just toured the
3 district, and when she met constituents, this was
4 like a document --

5 FORMER STAFFER 4: Yeah.

6 MR. QUINN: -- or almost like a business
7 card that she could give to constituents?

8 FORMER STAFFER 4: Yeah.

9 MR. QUINN: Okay. Any other family
10 members that you remember interacting with?

11 FORMER STAFFER 4: No.

12 MR. QUINN: I had asked earlier if you
13 knew of any other staffers that did tasks related
14 to his dry cleaning or laundry. And I think,
15 maybe, you gave me an answer that was a little
16 broader, just other personal errands. That was
17 when you described Kate Morgan looking after the
18 congressman's daughter.

19 FORMER STAFFER 4: Uh-huh.

20 MR. QUINN: Are there any other personal
21 errands that you can think of that you heard of
22 other staff members doing?

1 FORMER STAFFER 4: I mean, no. Uh-uh. I
2 think that was it. Well, actually -- sorry. Do
3 you only mean during my time there? Because I
4 know -- I think the previous office assistant --
5 and I do recall this actually when I was
6 interviewing. The previous staff assistant asked
7 me, like, a very oddly specific question about
8 getting car keys. How would I handle a situation
9 if the congressman needs his -- like, his daughter
10 needed car keys that day. It was something very
11 oddly specific.

12 It was very weirdly specific, but it was
13 John Jacobson who was the staff assistant who I
14 had replaced. When I got hired on, and I was kind
15 of given those tasks -- I mean, I don't know if
16 it's too bold of an assumption to make that John
17 Jacobson did those things as well, and did
18 personal errands for the congressman.

19 MR. QUINN: Okay. And so the question was
20 about -- well, if you could just repeat that.

21 FORMER STAFFER 4: It was something about
22 getting car keys to one of the congressman's

1 daughters, and how would I handle that.

2 MR. QUINN: And how did the rest of that
3 question and answer go, if you recall.

4 FORMER STAFFER 4: Oh, goodness. I think
5 I said something -- I think I honestly said
6 something about, like, making sure I had all the
7 necessary information to contact certain people.
8 Honestly, it was so long ago, I can't even
9 remember.

10 MR. QUINN: Okay. Actually, that's sort
11 of related. I was going to ask you if you ever
12 heard about other staffers driving Representative
13 Mooney, and if you have any recollection of having
14 folks drive him around?

15 FORMER STAFFER 4: Yes. So there was one
16 day -- and I didn't have my driver's license at
17 the time, and it was kind of like a known thing in
18 the office. I'm from New York City. Like, I had
19 no need to ever get my driver's license. Kate had
20 texted me one morning saying, hey, the congressman
21 needs to be picked up from the University of
22 Maryland, can you go get him. This was like 7:00

1 in the morning she texted me. And I responded.
2 And I was like, I don't have my license, I can't
3 get the congressman. And then I think she ended
4 up going to pick him up.

5 MR. QUINN: Okay. But other than that,
6 did he have somebody that was his known driver or
7 any other driving-related tasks?

8 FORMER STAFFER 4: No. He had his own
9 car.

10 MR. QUINN: Okay. Any other conversations
11 with other staffers, or anybody else about
12 personal errands or, you know, talking through
13 whether or not you could do them, or should do
14 them, or maybe people complaining about being
15 assigned personal errands?

16 FORMER STAFFER 4: No. No one in the
17 office, but I will say once I left, obviously,
18 like -- I left and was like, yeah, I had to do
19 that. Everyone was like, you know you're
20 ethically not supposed to be doing that, right.
21 And I'm like, well, I quit, so it doesn't really
22 affect me anymore.

1 MR. QUINN: And that was in reference to
2 what task?

3 FORMER STAFFER 4: The personal errands,
4 so picking up the dry cleaning, picking up the
5 snacks.

6 MR. QUINN: Okay. So then other than the
7 birthday party, and the personal errands, I have
8 just a couple of more general questions, and then
9 we're pretty much done.

10 Annie, did you have anything on the
11 birthday party or the personal errands?

12 MS. CHO: Sorry. I was trying to find the
13 mute button. No. I think you've covered it.

14 MR. QUINN: Okay. Great.

15 Then just generally, Former Staffer 4, is there
16 anybody else -- so, obviously, you know the issues
17 we just talked about, birthday party, personal
18 errands. Is there anybody else that you think we
19 should speak to, or that you think has a lot of
20 kind of firsthand knowledge about any of those
21 topics?

22 FORMER STAFFER 4: I mean, any of my -- I

1 mean, I hate to say it, but any of my interns at
2 the time since they kind of helped me with the
3 event. I would say the intern who I worked with
4 for the first, like, week or two that I was the
5 staff assistant, whose name I legitimately cannot
6 remember. I can probably try to find out. He was
7 there for the entire spring semester, if I recall
8 correctly, so he might have -- he might know.

9 MR. QUINN: Okay. And that was either
10 Ashley Christopher, Jonathan Partamian, or
11 Matthew Harris?

12 FORMER STAFFER 4: Those are my current
13 interns. There was one more intern who I,
14 obviously, wasn't in charge of because I was so
15 new. He left because I got hired over him. He
16 left, I think, a week or two after I on-boarded.

17 MR. QUINN: Okay.

18 FORMER STAFFER 4: So he might. John
19 Jacobson, since he was obviously the previous
20 staff assistant, and I think that would be it.

21 MR. QUINN: Okay. And then any other
22 issues that we haven't covered today that you

1 think we should know about?

2 FORMER STAFFER 4: No. I think that's it.

3 MR. QUINN: Okay. Then just a couple of
4 more questions. Is there anybody else that you've
5 talked to about our review, or investigation, or
6 about this interview?

7 FORMER STAFFER 4: Uh-uh.

8 MR. QUINN: Okay.

9 FORMER STAFFER 4: Actually, does my baby
10 count?

11 (Laughter.)

12 MR. QUINN: Sure. We'll count that. And
13 then other than the documents that you produced to
14 us, have you looked at anything to kind of refresh
15 your recollection, or anything else that you might
16 have, document-wise, that you might want to
17 produce to us?

18 FORMER STAFFER 4: I think that's
19 everything. I mean, I can take one more look, and
20 see if, by chance, I left anything off. But I
21 made sure to put in all the attachments that I
22 had. I did try to find -- at the event, I did

1 take photos of the congressman with some people.
2 I tried to see if it was somewhere saved in my
3 e-mail, and it wasn't.

4 So I don't know if it's on a server at the
5 office, or where those could possibly be, but I
6 know that they are uploaded somewhere. I just
7 don't have them.

8 MR. QUINN: Okay. Great. Yes. If you
9 think of anything else, or find anything else,
10 just let me know, and you can send those over.

11 FORMER STAFFER 4: Uh-huh.

12 MR. QUINN: But it looks like, at least as
13 far as I can tell from my review, the production
14 looks pretty complete. So thank you for doing
15 that work getting that together.

16 FORMER STAFFER 4: Uh-huh.

17 MR. QUINN: Okay. Great. And with that,
18 we should be done. We can take that document off
19 the screen. And then unless Annie has anything
20 else for you, that's all I have.

21 MS. CHO: That's it.

22 MR. QUINN: Good. Okay. All right,

1 great.

2 Well, we can go off the record now, Tim.

3 (Discussion off the record from 10:43 a.m.
4 until 10:45 a.m.)

5 MR. QUINN: I'm just going to show you two
6 more documents real fast while I have you, and you
7 can just answer a couple of questions about that.

8 Delaney, if you can pull up Tab 1.1.

9 THE TECHNICIAN: Okay. And this will be
10 marked as Exhibit C; is that correct?

11 MR. QUINN: Yes.

12 THE TECHNICIAN: Please standby.

13 (Former Staffer 4 Interview Exhibit C was
14 marked for identification, and attach today the
15 transcript.)

16 MR. QUINN: So this is a document that was
17 attached to one of the e-mails that you sent me,
18 and, actually, let's also pull up that e-mail.
19 We'll switch back to this in a second, Former Staffer 4.

20 Delaney, if you can pull up Tab 1 and mark
21 that as Exhibit D.

22 THE TECHNICIAN: Okay. Standby.

1 MR. QUINN: Sure.

2 (Former Staffer 4 Interview Exhibit D was
3 marked for identification, and attach today the
4 transcript.)

5 MR. QUINN: Okay. So this is an e-mail
6 from Mike Hough to you and Representative Mooney
7 sent on -- can you scroll it down, Delaney? Do we
8 have a Bates Number on this document?

9 THE TECHNICIAN: It doesn't. I don't
10 think so.

11 MR. QUINN: Okay. That's fine. So this
12 is an e-mail from Michael Hough to you and
13 Representative Mooney sent on Wednesday, 5/30/2018
14 at 1:26 a.m. The subject of the e-mail is, Draft
15 Invite List. And Mr. Hough says, Here's my first
16 draft at it using donors and old contacts. And
17 then there's an attachment. It's titled, Invites
18 docx.

19 If you could pull up that exhibit. Do you
20 see it now, Delaney, Tab 1.1? Okay.

21 Also does this look like the invite list
22 for Representative Mooney's birthday party?

1 FORMER STAFFER 4: Yes. So he did have,
2 like, an A invite list, a B, and I don't remember
3 if he had a C. It was kind of like you would be
4 sub-in based on who could go and who couldn't.

5 MR. QUINN: And I think you produced the B
6 invite list to us, which we'll look at in one
7 second. If you want to look at this -- and so
8 this is the A invite list, you think?

9 FORMER STAFFER 4: Maybe. Maybe he pulled
10 a couple of names off of that because some of the
11 names do look familiar.

12 MR. QUINN: Okay. So it's a first, it
13 looks like, from the e-mail. So Hough's first
14 draft or first attempt at putting together the
15 invite list; is that right?

16 FORMER STAFFER 4: Yeah.

17 MR. QUINN: Okay. If you want to look
18 just at this list real quick, and tell me if any
19 of the names jump out at you, if you remember
20 anything about the folks that were invited. You
21 can take your time.

22 FORMER STAFFER 4: Well, obviously,

1 Andy Harris. He did not show up at the event. At
2 least I didn't see him there if he did show up. I
3 know that he and the congressman, they go back
4 from back -- you know, obviously, because the
5 congressman is originally from Maryland, so they
6 go way, way back.

7 MR. QUINN: Yes.

8 FORMER STAFFER 4: And then, of course,
9 Paul Teller as well is another name that stands
10 out to me. That's another one. I don't remember
11 if he attended or not. And then I think that's
12 it. Those are the only two names. Oh. And Ron
13 Robinson, who was the former -- I think that's
14 supposed to be Ron Robinson, the old president of
15 YAF, Young America's Foundation. I definitely did
16 not see him there.

17 MR. QUINN: Okay. Do you recognize the
18 name Dirk Haire?

19 FORMER STAFFER 4: No.

20 MR. QUINN: Okay. I also know who
21 Andy Harris is. I don't know who Paul Teller is.
22 Who is Paul Teller?

1 FORMER STAFFER 4: So he used to work in
2 the Trump Administration.

3 MR. QUINN: Okay.

4 FORMER STAFFER 4: I know he, like,
5 went -- he worked for, I believe, what used to
6 be -- not the Freedom Caucus -- Republican
7 Conference. So he kind of has like a long, long
8 history working in politics. Don't know what he's
9 doing now.

10 MR. QUINN: Okay. Let's take down these
11 documents, and if you can pull up Tab 3.

12 THE TECHNICIAN: Okay. And I think this
13 will be Exhibit E.

14 MR. QUINN: Correct.

15 THE TECHNICIAN: All right. Standby.

16 (Former Staffer 4 Interview Exhibit E was
17 marked for identification, and attached to the
18 transcript.)

19 MR. QUINN: Okay. And I know you
20 mentioned there was an A list, what I think we
21 just went through, and then a B list. Can you do
22 the same thing for this document? If you want to

1 take a minute or two to look and tell me if you
2 see any names that jump out at you, or if you can
3 remember anything specifically about any of these
4 B list invitees.

5 FORMER STAFFER 4: No. I mean, I'm sure I
6 e-mailed some of them, but none of them stand out
7 to me.

8 MR. QUINN: Okay. All right. Great.
9 Then you can take that document down, Delaney, and
10 then we can go off the record again.

11 (Off the record at 10:52 a.m. ET)

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CERTIFICATE OF INTERVIEWEE

I hereby certify that I have read and examined the foregoing transcript, and the same is a true and accurate record of the interview given by me.

Any additions or corrections that I feel are necessary, I will attach on a separate sheet of paper to the original transcript.

FORMER STAFFER 4

I hereby certify that the individual representing herself to be the above-named individual, appeared before me this _____ day of _____, 2021, and executed the above certificate in my presence.

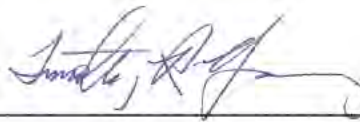
NOTARY PUBLIC IN AND FOR

MY COMMISSION EXPIRES:

1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC:

2 I, Timothy R. Yancey, the officer before
3 whom the foregoing proceedings were taken, do
4 hereby certify that the foregoing transcript is a
5 true and correct record of the proceedings; that
6 said proceedings were taken by me stenographically
7 and thereafter reduced to typewriting under my
8 direction; that review was requested; and that I
9 am neither counsel for, related to, nor employed
10 by any of the parties to this matter and have no
11 interest, financial or otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set
13 my hand and affixed my notarial seal this 24th day
14 of September, 2021.

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18 

19
20 TIMOTHY R. YANCEY, Notary Public

21 Notary Registration No. 2614

22 MY COMMISSION EXPIRES: 03/07/23

EXHIBIT 5

Transcript of Interview of Former Staffer 5

Review No. 21-6998

November 5, 2021

OFFICE OF CONGRESSIONAL ETHICS OF THE
U.S. HOUSE OF REPRESENTATIVES

- - - - - x

In re: FORMER STAFFER 5 : OCE Review Number:
: 21-6998

- - - - - x

Interview of FORMER STAFFER 5
Conducted Virtually
Friday, November 5, 2021
10:34 a.m.

Job No: 411471

Pages 1 - 57

Transcribed by: Barbara Montgomery

1 Interview of FORMER STAFFER 5:

2

3

4 conducted virtually.

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9 Pursuant to agreement, before Theo Green, Court
10 Reporter in and for the State of Maryland.

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A P P E A R A N C E S
ON BEHALF OF OFFICE OF CONGRESSIONAL ETHICS:
SEAN M. QUINN, ESQUIRE
ANNIE CHO, ESQUIRE
U.S. HOUSE OF REPRESENTATIVES
425 3rd Street, Southwest
Suite 1110
Washington, DC 20024
202-225-9739

ALSO PRESENT:
THEO GREEN, REPORTER/NOTARY

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C O N T E N T S

INTERVIEW

PAGE

By Mr. QUINN

5

(NO EXHIBITS)

1 P R O C E E D I N G S

2 MR. QUINN: So then, I'll just say for the
3 record that today is November 5th, 2021, and we're
4 conducting the interview of [Former Staffer 5] by
5 Zoom. [Former Staffer 5] is not represented today.
6 Speaking is Sean Quinn, investigative counsel of
7 the Office of Congressional Ethics. And I'm here
8 with Annie Cho, also at the OCE. The witness has
9 been given a copy of 18 USC 1001, and she has
10 signed the acknowledgment and will scan and return
11 it to me at her earliest convenience today.

12 BY COUNSEL FOR THE OFFICE OF CONGRESSIONAL ETHICS

13 BY MR. QUINN:

14 Q And once again, [Former Staffer 5], thanks very
15 much for your cooperation. I really appreciate
16 you making yourself available on such short
17 notice. And as we were talking about before, feel
18 free to stop me at any point if you have any
19 questions, or if you just need to take a break to
20 get some water or to use the bathroom, that's
21 always fine. We'll try to keep the interview
22 pretty short. I'm hoping about 30 minutes and no

1 longer than an hour, but you let me know if you
2 need a break.

3 A Uh-huh.

4 Q And then also, since we have a court
5 reporter here today that's transcribing everything
6 that we're saying, let's just do our best not to
7 speak over each other. And then also instead of
8 nodding or using sort of nonverbal cues, try to
9 make responses a yes or a no, so they can be
10 picked up by the transcript. Does that make
11 sense?

12 A Yes.

13 Q Okay. Great. Then, to begin, I just want
14 to start with a little bit of background
15 information. I understand that you used to be
16 employed by Representative Mooney, both in the
17 campaign and his official office; is that correct?

18 A Yes.

19 Q Okay. And can you tell me how you started
20 working for Representative Mooney?

21 A I started working -- the first time I
22 started working for him? Was --

1 Q Yeah. Sure.

2 A -- in 2002, and he was a state senator in
3 Maryland.

4 Q Okay. And how did you come to work for
5 him in 2002?

6 A I had friends that knew him, and I
7 interviewed for it as an executive assistant
8 position with him.

9 Q Okay. And that was in his official office
10 as a state senator?

11 A Yes.

12 Q Okay. Could you just take me through
13 maybe your roles with Representative Mooney from
14 2002 up until the time he started his federal
15 House campaign?

16 A I worked for him from 2002 to 2008 in his
17 -- as his executive assistant in his State office
18 in Maryland. That's right. And in 2000 -- or
19 2010, actually, he lost the state senate race, and
20 then I moved on to other jobs. In 2000 -- I guess
21 '11 or something -- I'm not exactly sure when he
22 became chairman of the Maryland Republican Party,

1 but I went back to work for him in 2000-ish '13 or
2 '14. I'm not really sure. It's been a while.

3 Q Yeah. And just to let you know, I know a
4 lot of this stuff happened a long time ago, so if
5 dates are approximate or you just need to, you
6 know, ballpark something, that's fine. Just let
7 me know that you're ball-parking a number.

8 A Okay. I'm ball-parking this. He was
9 chairman of the Maryland Republican Party. I came
10 back, and I was working just part time for the
11 Party and for some delegates in Maryland, and I
12 was finishing a college degree, so there's a lot
13 going on. Anyway, he decides to resign as
14 chairman of the Maryland Republican Party, and he
15 moved to West Virginia and began a campaign for
16 Congress around 2013. The election was in 2014.
17 I'm from that area, so I moved back as well and
18 started helping -- or working on the campaign.

19 Q Okay. So then --

20 A Then, that just moved into, he won the
21 election and then was sworn into office, and I
22 became -- my position in the office was assistant

1 to the Chief of Staff.

2 Q And at that time, who was the Chief of
3 Staff?

4 A Brian Chatwin.

5 Q And how long did you hold that position as
6 assistant to the Chief of Staff?

7 A December -- till the end of December in
8 2017.

9 Q Okay. And was Brian Chatwin the Chief of
10 Staff that whole time or did that change?

11 A I know it changed. I don't remember
12 exactly when Brian left. But Michael Hough, who
13 is -- I think is still the Chief of Staff now,
14 became the Chief of Staff. And I actually --
15 actually, you know what? My title did change
16 because I just became, like, a constituent
17 correspondent in the Martinsburg district office,
18 mostly because I had also gotten married and I was
19 -- I was going to leave 'cause my husband's in the
20 Navy, and we knew we were getting moved, so I was
21 just kind of moving out of a role there, and I
22 have a long history of constituent services. I

1 was the main constituent service person for --
2 when I worked for him as the state Senator.

3 Q Okay. And just so I understand, do you
4 mean that you were moving out of the role of
5 assistant to the Chief of Staff because you
6 couldn't do that if you moved, or you are moving
7 as in all roles?

8 A Right.

9 Q Okay.

10 A Well, and I was moving out of all roles
11 eventually.

12 Q Okay. Could you tell me really quickly,
13 do you know why Brian Chatwin left the
14 Congressman's office?

15 A He got a better job? I don't know. You
16 would have to ask him.

17 Q Okay. And then from this period of time
18 that you are -- so in 2015, when you took a role
19 in the official office, were you also working on
20 the campaign still at the same time?

21 A Yes.

22 Q Okay. And what were your -- let's just go

1 back to that time period that he started running
2 for federal office for the House. What were your
3 roles on the campaign during that time and then up
4 until --

5 A Yeah. My main role was helping with the
6 FEC reporting. Like, I would check the mail, get
7 the deposits together, send the information to the
8 people who wanted to know -- you know, Congressman
9 Mooney. Brian Chatwin was also helping. He was
10 also a consultant on that campaign. I don't know
11 if -- I think he was a consultant or a chairman --
12 you know, our fundraising people, so -- and I did
13 enter those numbers into a database called
14 Crimson. So -- and then I also helped volunteer
15 -- with volunteers. I was like, I guess,
16 volunteer coordinator. It was a pretty small
17 operation. There were, like, three -- or two or
18 three people at the beginning.

19 Q Okay. And so that's in 2013, 2014
20 timeframe?

21 A Yeah.

22 Q Okay. And then how did your -- if it

1 developed at all or if your role expanded, how did
2 it -- did it expand through the time that you
3 left?

4 A It didn't really expand. I basically just
5 did that -- because I lived in the district, and I
6 would just check the mail, take deposits to the
7 bank, send information, input it in Crimson.

8 Q Okay. So everything that you just
9 described was kind of your roles and your duties
10 up until -- I think you said you left in December
11 of 2017?

12 A Yeah.

13 Q Okay. And then, who else was in the
14 office at the time -- or sorry. Who else was
15 working at the campaign at that time? You said it
16 was a small operation.

17 A In 2014, our campaign manager was this
18 young guy, Nick Clemens, Brian Chatwin, myself,
19 Congressman Mooney -- oh, we had a consulting --
20 some consultants. Mark Harris was one of the
21 consultants, and he has people that work with him.
22 I don't remember the name of his firm or group or

1 whatever. Dan Hazelwood has always -- was a
2 consultant. But, I mean, they weren't in the
3 office working. They just give advice. Sorry. I
4 think that's all, but there are people coming in
5 and out. We probably had interns.

6 Q Okay.

7 A But I don't --

8 Q Those are the main people?

9 A Yes.

10 Q And was Mike Hough involved at that time?

11 A Not officially. I mean, he would maybe
12 come and help on the weekends, but he was not -- I
13 think he was still a delegate in the House of
14 Delegates at that time in Maryland, and he
15 possibly might have become a senator by then, but
16 I don't know.

17 Q Okay.

18 A I don't remember.

19 Q And then, did you just report directly to
20 Representative Mooney or was there somebody that
21 you reported -- somebody else that you reported
22 to?

1 A No. I -- I reported to him and Brian
2 Chatwin.

3 Q Okay. Okay. So then you said -- we'll
4 talk a little bit more about the sorts of things
5 that you did when you were working there, but just
6 to keep on this point, just background information
7 of getting a timeline down. So you said that you
8 left in December of 2017. Can you tell me why you
9 left?

10 A My husband was -- he is in the U.S. Navy
11 and was reassigned to a language school in
12 Monterey, California, so we moved to California.

13 Q Okay. So the Defense Language Institute?

14 A Yes.

15 Q I was actually born there. Okay. Great.
16 So one of the things that we are interested in and
17 looking into are some allegations concerning
18 Representative Mooney that he was using staff for
19 personal errands and lots of personal tasks, as
20 opposed to just either official work with the
21 House or campaign work. Did you ever experience
22 anything like that, a feeling that you were being

1 asked to do errands that were more personal in
2 nature as opposed to work related?

3 A Yes.

4 Q Okay. Let's -- I'll have some specific
5 questions for you, but first, generally, you just
6 kind of want to tell me your experience in that
7 regard?

8 A I did personal things for Congressman
9 Mooney. Some things I was compensated for doing,
10 so I don't see that as a conflict per se because I
11 was paid, as, like, a babysitter. But that was
12 not during my working hours. I was also pretty
13 close with his children and wife because I had
14 been around so long.

15 So a lot of things I volunteered to do
16 because I lived nearby, and it was just easy to
17 run by and pick up some milk for my friend,
18 basically, because his wife was like my friend and
19 -- but -- yeah. So, I would guess I was asked to
20 do some things, but I didn't feel like if I didn't
21 do them, I was going to get punished.

22 Q Okay.

1 A If that makes sense.

2 Q Sure. Yeah, that does make sense. And
3 I'll ask you some specific questions so that we
4 can sort of suss that out. First, I just want to
5 ask, so you said that you were compensated. Do
6 you know who you were compensated by? Was it
7 Representative Mooney personally? Was it
8 compensated with campaign funds or like --

9 A No.

10 Q Okay.

11 A Not for the babysitting. I mean, he did
12 personally pay me. That was, like, from his own
13 personal money, or Grace would give me, like, 20
14 bucks or whatever if I, you know, sat with the
15 kids for an hour or two.

16 Q Okay. And so that was personal funds as
17 far as you are aware?

18 A Yes. Well, it was cash, so it was not
19 campaign funds because you don't really deal with
20 cash in the campaign.

21 Q Okay. And when -- when did these sorts of
22 requests start? I'm interested in -- in the --

1 just so you know, a couple different time periods.
2 Less interested in the period before he had a
3 federal campaign, and then also interested to know
4 whether or not these tasks were done while you
5 were also a part-time employee at the house. So
6 maybe, let me know when those tasks started, and
7 did they continue through the whole time that you
8 were working for him?

9 A Yes. They started from the beginning to
10 the end.

11 Q Okay. And then you also mentioned
12 sometimes you would run errands, like
13 grocery-related errands, picking up groceries for
14 the Mooneys?

15 A Yes.

16 Q Okay. How common was that?

17 A It was pretty common. Maybe -- I mean, if
18 you consider just picking up a gallon of milk,
19 picking up groceries, which I guess you would, it
20 can be once a week.

21 Q Was it always pretty limited to just one
22 or two items or were there occasions --

1 A Yes.

2 Q Okay.

3 A The only occasion where I would pick up a
4 bunch of things usually was, I would pick up some
5 stuff for them, but I also was buying stuff for
6 the campaign for our office, like toilet paper,
7 things like that, and for events, to feed
8 volunteers, and stuff like that. But that was not
9 for them. It was for our office -- our campaign
10 office.

11 Q Okay. And when -- were you sometimes
12 doing both of those things at the same time,
13 picking up some personal items and then also
14 campaign items?

15 A Yes.

16 Q Okay. And when you -- when you did that,
17 did you -- or how did you split the costs? How
18 did that normally work?

19 A A lot of times I would pay for the
20 personal items myself and get reimbursed. And I
21 would pay for the campaign stuff with the campaign
22 credit card that we had.

1 Q Okay.

2 A Alex would usually give me cash for the
3 personal items.

4 Q Okay. Did you ever have the feeling or
5 get the impression that Representative Mooney or
6 his wife or any member of his family were putting
7 personal items on the list of items for the
8 campaign, so I mean using campaign funds to
9 purchase groceries that were actually used in the
10 house or for their personal consumption?

11 A No. Not intentionally.

12 Q Okay. And what do you mean when say not
13 intentionally?

14 A So our campaign office for -- at the
15 beginning of the congressional campaign, it was in
16 the basement of his home, and so I -- if I bought
17 toilet paper for our office, inadvertently, you
18 know, I guess they could have used the toilet
19 paper in that bathroom, paper towels in that --
20 there was a kitchenette, maybe tissues. I mean,
21 you know, it wasn't intentional. It was --

22 Q Right.

1 A It was --

2 Q Minor usage?

3 A Proximity of, like, house -- the office in
4 the house.

5 Q Right. Okay. I'm going to run through a
6 couple other different types of tasks that we've
7 heard from other witnesses that they would have
8 done for Representative Mooney or the Mooneys, and
9 you can tell me if you ever had any similar
10 experiences. I know we talked about babysitting.
11 How about dog sitting or doing tasks related to
12 the dog?

13 A Yes. I walked the dog.

14 Q Did you say you loved the dog?

15 A I loved the dog, and I walked the dog.

16 Q What -- what was the dog's name, by the
17 way?

18 A Skippy --

19 Q Skippy.

20 A Skipper, it was. I don't even know if he
21 is still alive. A Beagle dog they had.

22 Q So you walked the dog. Any other types of

1 tasks related to the dog?

2 A I would -- I stayed at their house and
3 watched the dog overnight. I brought the dog with
4 me places but because I loved the dog.

5 Q Okay. How about driving the dog to
6 Representative Mooney's wife's parents' home?

7 A I don't know if I ever did that.

8 Q Okay.

9 A 'Cause -- wait. Say that -- can you
10 repeat the question?

11 Q Sure.

12 A Did I drive the dog to Grace's parents'
13 house? I don't remember. I may have. I don't
14 remember.

15 Q Okay. How about, like, driving-related
16 tasks? Did you frequently drive the Mooneys or
17 family members places?

18 A Yes.

19 Q Okay. And -- and, again, I want to
20 clarify the difference between driving them to an
21 official event versus driving them for what seemed
22 like a personal errand or appointment.

1 A Yes.

2 Q Did you take them to personal appointments
3 or for functions that seemed personal in nature?

4 A Yes.

5 Q Okay. And can you describe that generally
6 for me?

7 A Yeah. I would drive the kids to different
8 activities.

9 Q Okay. What sorts of activities, if you
10 can remember? I know this was a while ago, but --

11 A I drove -- I don't remember exactly. I
12 guess because they didn't go to school -- they
13 were home-schooled -- but they would have extra
14 things like -- I'm trying to think of one of the
15 things. I don't know. Like, I would drive [REDACTED]
16 to the library to, like, go to a class or
17 something.

18 Q Okay.

19 A They have co-op classes with other kids,
20 so I'd drop them off.

21 Q Okay. So to and from school-related
22 activities. How about sporting events?

1 A An actual sporting event? I don't think
2 so, no.

3 Q If -- were they in any sports?

4 A I don't really remember. I feel like
5 ██████ did some sports, but I don't remember what
6 they were.

7 Q Okay. How about taking medicine for the
8 Congressman or his family? Do you ever recall
9 doing that?

10 A Yeah.

11 Q And can you just tell me about that? Was
12 that a frequent task or --

13 A I wouldn't say frequent, but I feel like
14 there was at least one time where they were all
15 pretty sick, and I brought them some medicine. I
16 don't even know what it was. I don't remember
17 what I bought, but I probably volunteered to do
18 that. I'm pretty sure I did, actually. Like,
19 your whole house is sick? Of course, I'm going to
20 bring you some medicine.

21 Q Right. Right. Do you know Rainer Kissel
22 -- or Rainer? I may be saying the name wrong.

1 A Rainer? Yes.

2 Q Rainer Kissel. Okay. Was he also
3 somebody that the family relied on to do these
4 sorts of tasks -- driving tasks, tasks related to
5 the children?

6 A Yeah. I think Rainer did drive the
7 kids --

8 Q Okay.

9 A -- at some point.

10 Q Okay. Anybody else that you can think of
11 that you know would have done these sorts of
12 personal errands or tasks?

13 A Hannah Mansell. She was an intern and
14 then worked with us at some point. I don't know
15 when she became an actual official employee, but
16 she started interning with us when she was in high
17 school. Maybe Nick Clemens. I'm trying to think
18 of other people that might've been -- I think
19 that's -- there might be others, but I can't
20 really --

21 Q Okay.

22 A -- say for sure.

1 Q And -- okay. As we've been talking about
2 this, maybe your memory has been jogged a little
3 bit. Any types of tasks that you remember doing
4 for the family that we haven't talked about?

5 A Not specifically.

6 Q Okay. And then I want to talk a little
7 bit about the period of time that you were both a
8 part-time employee in the house and also assisting
9 with the campaign. How did you split your time
10 between your official position and your campaign
11 position?

12 A It depended. It varied. I would drive
13 Congressman Mooney to Washington. So the days
14 that I drove him, those were kind of like -- those
15 were not official days. If they didn't need me to
16 be in DC for something, like a meeting or to drive
17 him or whatever, I would stay back in the district
18 where I lived and catch up on the campaign duties
19 that I had.

20 Q Okay. So you didn't have specific
21 assigned days, like Monday, Tuesday, campaign,
22 Wednesday, Thursday, Friday --

1 A It was usually like -- usually Monday I
2 did work on campaign stuff because they don't have
3 to be in until later -- like session doesn't start
4 until later, so in the mornings, I would work on
5 campaign stuff. Tuesdays, Wednesdays, Thursdays I
6 could be in DC, and I would stay down there with
7 friends and sometimes -- or come back, it
8 depended. It's about an hour or
9 two-and-a-half-hour drive, depending on traffic.
10 So -- and, usually, I guess Fridays I would try to
11 stay in the district if I could and then work
12 again on the campaign.

13 Q Okay. And then focusing on the times that
14 you would drive Representative Mooney to DC for
15 session, did you claim mileage for that -- for
16 those when you would drive him like that?

17 A No.

18 Q Okay. And did you basically -- were you
19 the one that drove him most of the time or every
20 week into DC?

21 A No. It was different all the time.

22 Q Okay. How frequently would you say?

1 Like, in a given month, how often you would drive
2 him into DC?

3 A Well, I guess it could be once a week.
4 Either I was driving him in or I was driving him
5 home. But other people -- he would also have --
6 Rainer, I think, drove him a lot. Ted Dacey, who
7 worked in our office, would drive him some.
8 Sometimes he'd just drive himself.

9 Q I was just going to ask.

10 A It was just very depending on what was
11 happening. What was going on during that week --

12 Q Okay.

13 A -- and what he had going on in DC.

14 Q Okay. Understood. How would -- was it
15 rare that he drove himself or was that pretty
16 common?

17 A No. It was rare.

18 Q Okay. And do you know if other -- if
19 other people were claiming mileage for driving him
20 to and from DC?

21 A I don't know.

22 Q Okay. And just one more time, you said

1 you never claimed --

2 A Well, I don't remember.

3 Q Okay.

4 A Okay. I don't know if I never claimed it,
5 but I don't think I typically claimed mileage.

6 Q Okay. Great. Yeah, that's all. I wasn't
7 trying to pin you down on that. Just, generally,
8 was it standard for you to claim mileage, and it
9 sounds like it was, no?

10 A No.

11 Q Okay. I guess -- you know, not to hide
12 the ball, I just -- I am interested in asking that
13 because if Representative Mooney was claiming
14 mileage for himself during that time, and it was
15 frequently, I just wanted to know, was it more
16 likely that somebody else was actually driving him
17 to and from DC?

18 A Yeah. I honestly don't really remember,
19 but I don't really think I claimed that much
20 mileage, if I claimed any. Maybe I did, though.
21 I'll be honest, I cannot remember. I feel like,
22 though, Rainer did claim mileage. I don't know

1 why specifically him, but he -- for a while, he
2 was driving the Congressman quite a bit, like
3 maybe not to DC but in the district.

4 Q Okay. So let me just make sure that I
5 understand, kind of sum it up and make sure. You
6 can tell me if I'm understanding this correctly.
7 In most cases when the Congressman was traveling
8 to or from DC, somebody else was driving him, but
9 in some kind of rare cases, he would drive
10 himself.

11 A Yeah.

12 Q And was it always using your car when you
13 drove him, or would you use one of his cars and
14 drive him?

15 A I would use my car.

16 Q Okay. Great. And then just generally on
17 the sort of personal tasks that we were talking
18 about, do you know of anybody that had any
19 difficulty in the office because they didn't want
20 to do these sorts of personal tasks or refused to
21 do them?

22 A Difficulty in, like, doing, like --

1 Q As in -- sorry. Go ahead.

2 A I'm not sure what you mean by difficulty.
3 Like, they felt like they would get fired if they
4 didn't do them?

5 Q Sure. Yeah. Either were reprimanded or
6 maybe just were disfavored in the office generally
7 because, you know, they were known as somebody who
8 wouldn't do what the Congressman asked them to do,
9 anything like that?

10 A There could probably -- people -- somebody
11 might have felt that way. I don't actually know.

12 Q Okay.

13 A I was pretty close to the Congressman and
14 his family so people might not have been honest
15 with their opinions about them to me because I've
16 been -- I was at their wedding. I was there when
17 every child was born, so I don't know.

18 Q Okay. And then, in general, kind of our
19 review is just looking into irregularities and how
20 the Congressman ran his official office and the
21 campaign. Are there any other sort of
22 irregularities, either in -- I'll just leave it,

1 actually, in that general question. Any sort of
2 irregularities that you noticed when you were
3 working with the Congressman that you felt might
4 be potential concerns?

5 A Not at the time. I did not --

6 Q Okay.

7 A -- know or think that it was irregular.

8 Q Okay. And now, is there something that
9 you've realized since you left was an issue or was
10 irregular?

11 A It's a little under (inaudible) now
12 because I know -- I've read all these articles
13 about him, and the -- the Chick-fil-A orders and
14 Taco Bell orders. Most of those orders were
15 actually for -- I mean, I don't know of all of
16 them because I didn't have his campaign card. I
17 wasn't with him all the time, but I would say
18 90 percent of that actually was for volunteers. I
19 bought so much pizza, Chick-fil-A, whatever,
20 Burger King or Roy Rogers or whatever's there in
21 Charlestown. But I know that that is -- from
22 reading these articles that that was an issue. At

1 the time, I did not think that that was anything
2 that was suspicious, or me driving him was
3 suspicious, or any of this stuff, but apparently I
4 guess it is.

5 Q Okay. So --

6 A That being said, I was 22-years-old when I
7 started working for them, so pretty much I did
8 anything he asked me to, and we had a good
9 relationship, and I didn't think it was wrong at
10 the time.

11 Q Okay. Got you. And so you left in
12 December 2017 and moved out to California?

13 A Yes.

14 Q I understand you're back in Maryland now;
15 right?

16 A Yes.

17 Q Okay. And do you -- are you still in
18 contact with the Congressman or folks from the
19 office?

20 A I actually have not spoken to Alex in a
21 long time, up to possibly two to three years.
22 It's unclear. I speak to other people -- other

1 staff people, like, former staff people but not on
2 a regular basis. It's like, have a Merry
3 Christmas kind of deal. It's -- just grew apart.
4 There's no animosity or anything. Just
5 everybody's moving on.

6 Q Okay. And is that the same for the
7 Congressman? It sounds like at some point you
8 were pretty close with the family, but that's no
9 longer the case?

10 A Yeah. I mean, there's no animosity that
11 I'm aware of. It just -- like, moving around --
12 I've moved like five or six times in the last -- I
13 moved twice in California and back across to
14 Virginia Beach. It's just moving a lot. It's
15 being a Navy spouse is more of anything, I think.

16 Q Okay. And so you haven't worked with his
17 campaign -- or I guess, obviously not the official
18 office, but you haven't done any campaign work
19 since 2017?

20 A No. I think I did do some stuff in 2018.
21 In 2018? Was that an election year? Yes.

22 Q Yes. I think so.

1 A I think I did help, but I was in
2 California. But I came home because my parents
3 are still -- all my family is on the East coast,
4 so I would come home. And sometimes I did, like,
5 help probably. But nothing like -- like, I would
6 be, like, another volunteer just showing up to
7 help.

8 Q Okay.

9 A Like, I wasn't in charge of anything at
10 that point.

11 Q Right. Got you. Okay. So basically, the
12 last thing that I want to talk to you about is
13 there were -- from other witnesses that we've
14 spoken to and folks that were in the office,
15 allegations about your departure from the campaign
16 that relate to either you obtaining campaign funds
17 inappropriately or in a way that either upset
18 Representative Mooney or obviously was
19 inappropriate in some way. Are you aware of any
20 of those allegations?

21 A No. This is the first time anyone has
22 ever said that to me, ever.

1 Q Okay. That's interesting. And I'll give
2 you a little more detail. But there -- I mean,
3 just to be specific. The allegation from multiple
4 staffers is that it is known in the office that
5 when you left the campaign, you departed with
6 funds that I think were probably -- or the vehicle
7 for the -- for taking the funds was through the
8 campaign debit card that Representative Mooney has
9 discussed and Mike Hough has discussed having to
10 cover this up with FEC reports, and essentially,
11 hiding the trail of the missing money from that
12 time. You've never heard of this before?

13 A No. Oh, my God.

14 Q Yeah. Is there -- can we go back to that
15 time, December 2017, or the time that you left?
16 Is there -- were there any other issues, maybe
17 issues around missing funds from the campaign that
18 you can recall?

19 A Missing funds? Like, no, I don't. No.

20 Q Okay. And nobody's ever spoken to you
21 about these sorts of allegations? And not to --
22 you know, not to put too much pressure on you, but

1 I just want to remind you that we talked about the
2 False Statements Act, you know --

3 A No one has ever talked to me about this.

4 Q Okay.

5 A But, basically, you're saying that they
6 are accusing me of stealing money?

7 Q Yes. The allegation, essentially, is that
8 you left with something in the order of tens of
9 thousands of dollars --

10 A Tens of thousands of dollars?

11 Q The figure I've heard is \$40,000, and that
12 it is just generally known in the office that
13 around late 2017 or 2018, one of the reasons for
14 your departure was a controversy over missing
15 campaign funds.

16 A No. That is not true. That is absolutely
17 not true. No one has ever said this to me at all,
18 and I did not steal any money from them.

19 Q Was there --

20 A I left -- they had a big party for me
21 before I left. I came back and helped him on the
22 campaign in '18 -- in 2018. No one ever said

1 anything to me about this. I took his -- this is
2 not -- this is just a personal thing. It has
3 nothing to do with the campaign, but Grace asked
4 me to take [REDACTED], their daughter -- this is in
5 2018 -- like, it might have been in the spring or
6 fall. I can't remember because I went to New York
7 City and it snowed. I can probably look up the
8 dates. But I took her to New York City with her
9 friend to go see Harry Potter.

10 Q Is there -- is there a possibility, you
11 know -- I mean, it's certainly a possibility that
12 you're a scapegoat in the situation. Do you
13 recall any --

14 A Yeah. Well, obviously it sounds like
15 that.

16 Q Do you recall any issues at the time that
17 maybe are related to these allegations? Were
18 there any concerns with other staffers or did you
19 notice -- since you were involved in the FEC
20 filings, did you notice any irregularities in
21 those filings?

22 A Through -- say that again?

1 Q I guess, I'm just trying to identify --
2 maybe since you're not aware of the allegations
3 and you're denying them, which I understand, I'm
4 hoping maybe you could give me some information or
5 details that would put me in the right direction
6 where what actually was going on. Did you ever
7 notice any other issues or irregularities in FEC
8 filings or missing funds that might actually be
9 the true, you know, reason that these funds
10 were --

11 A So missing -- they can't account for some
12 money because they probably -- we didn't -- look,
13 I'm not an FEC expert. I never was. I just typed
14 in the things. And actually, Alex reviewed every
15 single report. I would have to schedule meetings
16 for him to go through and look at every single
17 report I filed because I did file the reports.
18 But it was basically typing in all of the
19 information into the Crimson database.

20 He would look over it and Brian Chatwin
21 sometimes -- or whoever was there would also look
22 over it. But like, you know, that -- I don't know

1 why there would be -- there was no -- there was
2 never money missing they can't account for because
3 they probably just didn't keep the receipts -- or
4 I don't know what's happened. I don't know
5 exactly what time you are looking at. I don't
6 know what's happened since I haven't been there.
7 But I don't know that there was -- so they can't
8 account for the money, so they're like, oh, we
9 think [Former Staffer 5] stole it. What the hell? Sorry.
10 Excuse me.

11 Q That's okay. There -- maybe, let's
12 approach it this way. Who else had access to the
13 campaign funds around the time that you were
14 leaving, so late 2017?

15 A Yeah, the girl -- Hannah Mansell took over
16 doing that too. Again, Hannah was just like me.
17 We just -- we're not -- no one ever trained us. I
18 trained her just to have -- this is how you put
19 the stuff in, you know, make sure that you account
20 for all the credit cards, all the checks. We
21 didn't really deal much with cash. You know, you
22 have to have the occupation -- you know, like,

1 employer stuff and -- but there was no, like, real
2 running, like, budget or bank account balance.

3 I mean, we had one. We looked at it all
4 the time, but none of us were bookkeepers or
5 accountants, so we didn't really watch it, I
6 guess, as closely as we should, obviously,
7 because, like, here we are.

8 Q So Hannah would have had access to the
9 funds. Who else at the time was able to spend
10 money from the campaign accounts?

11 A Oh, spend money. Well, Alex, me,
12 depending on the time, like -- I don't remember if
13 any other -- if other people had credit cards.
14 The campaign managers maybe had credit cards at
15 some point, which was -- at the beginning, one of
16 the campaign managers was Nick Clemens I
17 mentioned. Ted Dacey was a campaign manager at
18 one point. I don't think Brian Chatwin ever had
19 any credit cards or anything like that. Hannah,
20 as I was leaving -- when I left -- had a credit
21 card. I mean, I guess you could ask the bank.
22 Obviously they would know who had debit cards or

1 credit cards.

2 Q But you think the likely people, the main
3 folks, would have been Alex, Ted Dacey, Nick
4 Clemens and yourself would have had access to
5 actually spending money from the account?

6 A Yeah, and Hannah.

7 Q And Hannah. Okay. When you left, were
8 you paid any sort of severance or receive, like, a
9 severance package or a buyout or anything like
10 that?

11 A No.

12 Q Have you -- either at the time that you
13 were there or since you've left, have you heard
14 any allegations about anybody else involved in any
15 sort of financial wrongdoing related to the
16 campaign?

17 A No. Just the stuff I've read about the
18 allegations towards the Congressman.

19 Q You mentioned that other -- that -- you
20 haven't spoken with the Congressman in a while,
21 but there are other folks from the office or the
22 campaign that you stay in touch with for holidays

1 or birthdays. Can you tell me who those people
2 are?

3 A Brian Chatwin, Nick Clemens. I haven't
4 talked to Ted Dacey in a long time, but I do --
5 his brother works with me. He works at MDOT, and
6 I also work at MDOT, so I do talk to the brother
7 and kind of hear about the family through him.
8 That's pretty much it.

9 Q Okay. And then I just want to let you
10 pause for a second and think about it, and then
11 again just remind you of the False Statements Act
12 again. I just want to make sure you can't
13 remember any conversations with anybody having
14 ever spoken to you about your departure being
15 related to any sort of financial misconduct. This
16 is the first you've ever heard of that?

17 A Correct.

18 Q Okay. If you don't mind giving me just
19 five minutes. I just want to look for my notes
20 real quick and you make sure I don't have anything
21 else to talk to you about. And then also just
22 give you a few minutes. I know that was probably

1 not the most pleasant thing to speak about or hear
2 about those allegations. So if we can go off the
3 record for five minutes, let's come back on, and
4 I'll ask a couple wrap-up questions.

5 (A short recess was had.)

6 Q Last time you talked to the Mooneys was in
7 2019?

8 A It looks like. Actually, they invited me
9 to some kind of -- in May -- May 25th of this
10 year, I was invited to his 50th birthday party, so
11 apparently --

12 Q Well, I guess -- I guess that was one of
13 the things I wanted to ask you about.

14 A I mean, I didn't talk to him, but I got an
15 invitation. I did not go.

16 Q One of the things that I wanted to ask you
17 about was, it does -- it seems like you were very
18 close to them. You said you attended their
19 wedding and were there for their children's
20 births, but that don't have any contact with them
21 at this point. Is there anything else that you
22 think could explain that change in the

1 relationship?

2 A Well, I thought it was from moving around
3 and just like, you know -- I can't really do
4 anything for them anymore.

5 Q You said there was another time in 2019
6 that you might have spoken to them?

7 A Yeah.

8 Q I just noticed you turned your camera off.
9 Do you need a break for a minute? If you need to,
10 we can take a break.

11 A Yeah, just a minute.

12 Q Why don't we -- we can talk about
13 something else a little easier to talk about it,
14 and we can come back to this later if you need a
15 second to collect yourself. But I also just
16 wanted to ask about some of the FEC reporting, and
17 maybe if you could tell me who else was involved
18 or who else looked at reports or reviewed reports?

19 A Sorry.

20 Q No, that's okay. I understand.

21 A Who else looked at reports? I mean,
22 really just Alex. I mean, he had the final, like,

1 review of it.

2 Q Who -- did --

3 A I don't know.

4 Q When you would put in information into the
5 Crimson system, did it then kick out, like, a
6 filled out FEC report, expenditure report or a
7 receipt report?

8 A Yeah.

9 Q Okay. And so what was the process when
10 that would happen? You -- were you the one that
11 had Crimson generate that report?

12 A Yes.

13 Q Okay. And then what would happen after
14 that sort of report was generated?

15 A Well, like the first couple times I would
16 generate reports and go through them and look for
17 -- to make sure that donations were reported
18 correctly. Because sometimes people put credit
19 card donations through, it would put, like -- it
20 would just do it -- if somebody gave -- I forget
21 the limits but, you know, whatever the limit is,
22 it would give, like, one credit card transaction

1 the entire general and primary amount.

2 This is not the amount, but I'm just going
3 to use it as an example. Say it's \$6,000 total.
4 Well, it comes through as \$6,000, but you have to
5 separate it out. So, \$3,000 goes to the primary
6 and \$3,000 goes to the general. Because if you
7 don't run the primary, you have to give the money
8 back. So you have to make sure those are reported
9 correctly, they have the occupation employers. So
10 it's been, like, four years since I've done one,
11 and I don't remember all the details. But make
12 sure the names are spelled right, just the address
13 is there.

14 Q So once you run the report --

15 A Stuff like that.

16 Q So once you --

17 A I would go through and do that, and then
18 he would go through and just look at it too to
19 make sure I guess I was doing, whatever -- I was
20 doing it right.

21 Q Okay. And do you know who took over the
22 FEC reporting when you left?

1 A It was supposed to be Hannah, but I don't
2 know that for sure. I know she did at least one
3 report because I helped her -- I helped, like --
4 told her, like -- I gave her, like, oh, you should
5 do -- so she knew how to do it. Like, try to help
6 her because she was pretty young.

7 Q Okay. And then just another person that
8 we haven't talked about that I know might have
9 been around at that time. Do you know John
10 Caddock?

11 A Oh, yeah, John. Yeah. He worked in our
12 -- the congressional office. I think he was, like
13 -- he was marked as maybe like a legislative
14 correspondent and then moved up to LA at some
15 point. I'm not sure exactly.

16 Q Okay. And then did he ever work on the
17 campaign?

18 A I don't remember for sure. He -- we did
19 not work together very long. Like, out of all the
20 people I worked with in Alex's office, he was,
21 like, he came on, like, right before I left, I
22 think, or not far after that I, like, left.

1 Q Okay. And then when you had a campaign
2 card, other than groceries that were for the
3 campaign office or for campaign events, what sort
4 of items would you frequently charge to the
5 campaign card?

6 A Food the volunteers.

7 Q Okay. Anything else?

8 A That's probably the main thing. I can't
9 think of anything now, but it doesn't mean there
10 weren't other things.

11 Q Okay. And did you ever have anything that
12 were personal charged to the campaign card? Did
13 you ever use the card to purchase anything for
14 yourself?

15 A No.

16 Q Okay. And, honestly, sometimes that just
17 happens and folks reimburse the campaign. Did
18 that sort of thing ever happen where maybe you
19 used the campaign card for something personal that
20 you later reimbursed the campaign?

21 A I don't think so, but it could have
22 happened.

1 Q Okay.

2 A I don't remember it happening.

3 Q All right. Well, with that -- actually,
4 I'll also ask, have you spoken to anybody else
5 about this interview or told anybody that you were
6 interviewing with the OCE?

7 A Yep, my husband.

8 Q Okay.

9 A My bosses because I'm using my boss's
10 office now. My current boss -- my current two
11 bosses.

12 Q Yep.

13 A My mother-in-law. Do you want the whole
14 list of people?

15 Q Anybody that you spoke to connected to
16 Representative Mooney or his constituent,
17 campaign.

18 A No.

19 Q Okay.

20 A No. That isn't true. I talked to Brian
21 Chatwin.

22 Q Okay. What did you talk to Brian about?

1 A I saw an article -- I've been seeing the
2 articles about Alex, and we talked about that.
3 And we talked about the upcoming election. And,
4 actually, I asked Brian -- I was going to call him
5 after this because I asked him if I thought this
6 was going to happen, and it did, and he told me he
7 didn't know. And --

8 Q Thought what was going to happen?

9 A I thought that someone would contact me
10 about the campaign stuff and working for Alex
11 because I saw the news articles that he had been
12 under some -- under review, and I had talked to
13 Brian about it. And I asked him if he had been --
14 anyone had talked to him and he said no. And I
15 told him that --

16 Well, at the time, nobody had contacted me
17 except I got some e-mails from Michael Hough
18 telling me not to destroy any records, which I
19 didn't. I got two e-mails from him about it. But
20 I mean, it wasn't personal -- I mean, they were
21 personally to me, but they weren't personal in
22 nature. It was just, like, oh, you're on -- this

1 is just the proceedings. You probably know. You
2 probably read the e-mail somehow or gave him the
3 language of, like, send this out to everybody in
4 the office --

5 Q Okay. Got you.

6 A -- or something like that.

7 Q When was the conversation with Brian?

8 A Hold on. 10/28/21.

9 Q Okay.

10 A That was when I got the first e-mail from
11 you. And then I asked him if they had -- if
12 anyone had contacted him, and he said no. But
13 then I found out that day that I had cancer, so
14 that was the rest of the conversation.

15 Q Got you. I'm sorry to hear that,
16 [Former Staffer 5].

17 A It's fine. It's not a big deal. It's
18 going to be fine. It's something simple but --
19 and then I wrote to -- I hadn't spoken to Alex in
20 three years, which isn't true, but I guess I got
21 e-mails from him.

22 Q Okay. Yeah. And that's what we had

1 started talking about. I think you mentioned that
2 you had some contact with them in 2019 with
3 Representative Mooney?

4 A Yeah. I was just going through my
5 e-mails. Well, the last contact was the
6 invitation to the party on May 25th, but I didn't
7 really respond to that. And then in 2019, I wrote
8 about -- actually, I guess he didn't actually
9 respond to this, but I told a bunch of people that
10 I used to work with about getting a new job. It
11 was, like, January 1st -- or January 7th of 2019,
12 but he didn't respond to that one.

13 I guess the last e-mail I have from him is
14 from 2018, 11/4/2018. But -- and I don't have any
15 -- I had erased all the text messages a long time
16 ago because there was -- it was, like, just
17 clogging up my phone.

18 Q Okay.

19 A And it wasn't just him. It was a bunch of
20 people.

21 Q Okay. All right. Well, then, we're
22 basically done except for, I just wanted to give

1 you one more opportunity. I know those are
2 upsetting allegations to hear, and so I just
3 wanted to give you another opportunity to maybe
4 give us any more details that might help us figure
5 out what actually was happening there. If you can
6 think of anything that maybe was a red flag from
7 that time or any other kind of irregularities that
8 might point us in the right direction, then that
9 would be helpful. I'll give you a second to think
10 about that. But then also, you know, if anything
11 comes to mind after this interview that you want
12 to let me know, then feel free to reach out.

13 A I mean, I know Alex goes on these trips,
14 like -- but they're for -- the Republican National
15 Committee has those trips every year to, like --
16 more than once a year. And I know he uses the
17 campaign to pay for that. I did not know that
18 Alex was illegal -- I mean, I don't think it is.
19 I don't actually know. I don't -- I'm not versed
20 in the law, which I guess is my own fault. But I
21 can't think of anything that was obviously illegal
22 or he shouldn't have been doing at the time, but

1 apparently -- obviously there was stuff going on,
2 so --

3 Q Okay. Well, I appreciate that and, you
4 know, like I said --

5 A I would also just like to say, if they are
6 accusing me of stealing money, why are they
7 sending e-mails still constantly every week? Why
8 wouldn't they take me off their e-mail list? Why
9 are they all still Facebook friends with me? I
10 don't understand -- I don't understand why.

11 Q Yeah, I understand. That's frustrating
12 and upsetting to hear. Like I said, if you think
13 of anything else that might point us in the right
14 direction or anything comes to mind about any
15 conversations you had before or after you left
16 that might be related to these allegations, then
17 feel free to let me know. But if you can't think
18 of anything else right now, then I think we can
19 finish the interview and conclude things there.

20 A Okay.

21 Q Okay. Well, one more time, thanks,
22 [Former Staffer 5]. I appreciate your time this morning

1 and your quick response to my e-mail yesterday.
2 And just be in touch if you have anything else you
3 want to let me know.

4 (Off the record at 11:49 a.m.)
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1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

2 I, Theo Green, the officer before whom
3 the foregoing proceeding was taken, do hereby
4 certify that said proceedings were electronically
5 recorded by me; and that I am neither counsel for,
6 related to, nor employed by any of the parties to
7 this case and have no interest, financial or
8 otherwise, in its outcome.

9 IN WITNESS WHEREOF, I have hereunto
10 set my hand and affixed my notarial seal this
11 11th day of November, 2021.

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20 _____
21 Theo Green, Notary Public
22 for the State of Maryland

CERTIFICATE OF TRANSCRIBER

I, Barbara Montgomery, do hereby certify that the foregoing transcript is a true and correct record of the recorded proceedings; that said proceedings were transcribed to the best of my ability from the audio recording and supporting information; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

Barbara Montgomery

Barbara Montgomery

November 12, 2021

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

ERRATA SHEET

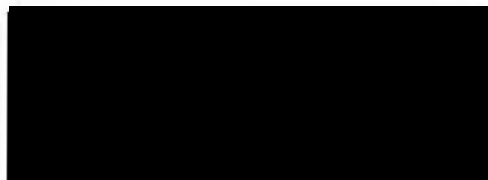
Page	Line	Correction	Reason
6	21-22	Remove	Personally Identifying Info.
7	1-22	Remove	Personally Identifying Info
8	1-14	Remove	" "
8	17	Remove	" "
8	22	Remove	" "
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14	10-15	" "	" "
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This errata sheet is submitted subject to 18 U.S.C. § 1001 (commonly known as the False Statements Act).

Witness Name:

Witness Signature:

Date:



12/1/2021

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

ERRATA SHEET

Page	Line	Correction	Reason
15	18	Remove	Personally Identifying Info.
20	14-15	Remove	Personal Info
20	18	Change Skippy to Crippey	Spelling
20	19	" "	" "
20	20	Change Skipper to Crippey	Spelling
22	15	change [REDACTED]	Spelling
25	15	take out "not"	Incorrect
25	18	Remove "where I lived"	Personal Info.
30	16	Remove	Personal Info.
30	17	Remove	Personal Info.
31	21	Change Charlestown to Charles Town	Spelling
32	6	Remove age	Personal Info.
32	12	Remove California	" "
32	14	Remove Maryland	" "
33	12-15	Remove	Personal Info
34	2	Remove California	Personal Info.

This errata sheet is submitted subject to 18 U.S.C. § 1001 (commonly known as the False Statements Act).

Witness Name:

Witness Signature:

Date:

12/7/2021

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

ERRATA SHEET

Page	Line	Correction	Reason
37	4	Change [REDACTED]	Spelling
42	5-8	Remove	Personal Info.
43	19	Remove	" "
43	20	Remove	" "
49	1	Remove	Personal
49	10	" "	" "
49	13	" "	" "
51	13	" "	" "
52	14	change date to 12/13/18	Wrong date

This errata sheet is submitted subject to 18 U.S.C. § 1001 (commonly known as the False Statements Act).

Witness Name:

Witness Signature:

Date:

[REDACTED]
[REDACTED]
12/7/2021

EXHIBIT 6

Transcript of Interview of Current Staffer 1

Review No. 21-6998

October 27, 2021

OFFICE OF CONGRESSIONAL ETHICS (OCE) OF THE
U.S. HOUSE OF REPRESENTATIVES

-----x

INTERVIEW OF CURRENT STAFFER 1:

: OCE REVIEW

: NO. 21-6998

-----x

Interview Of Current Staffer 1

Conducted Virtually

Wednesday, October 27, 2021

10:14 a.m. CST

Job No.: 409497

Pages: 1 - 38

Recorded By: Sue Pybas

1 Interview of CURRENT STAFFER 1,
2 conducted virtually.
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15 Pursuant to agreement, before Sue Pybas,
16 Notary Public in and for the State of Missouri.
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A P P E A R A N C E S

ON BEHALF OF THE OCE:

SEAN M. QUINN, ESQUIRE

ANNIE CHO, ESQUIRE

OFFICE OF CONGRESSIONAL ETHICS (OCE)

OF THE U.S. HOUSE OF REPRESENTATIVES

425 3rd Street, S.W.

Suite 1110

Washington, DC 20024

202.225.9739

(Present via videoconference)

Also Present:

SARAH LOILER - TECHNICIAN

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C O N T E N T S

INTERVIEW	PAGE
By Mr. Quinn	5

E X H I B I T S

(None marked.)

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P R O C E E D I N G S

EXAMINATION BY COUNSEL FOR THE OFFICE OF
CONGRESSIONAL ETHICS:

BY MR. QUINN:

Q And then just quickly for the record, on
the -- the -- today is October 27th, 2021. And
we are conducting the interview of [Current Staffer 1]
by Zoom. [Current Staffer 1] is not represented
today. Speaking is Sean Quinn, Investigative Counsel
at the Office of Congressional Ethics. And I'm here
with Annie Cho, also at the OCE. The witness has
been given a copy of 18 USC 1001, and has signed
the acknowledgment. [Current Staffer 1], first, just
thanks very much for your time today. As I said, we
appreciate your cooperation and any help that you
can give us in -- in conducting this review. So
thanks very much. And then also before we get
into kind of our discussion and any questions, I
just want to say first that I'm happy to answer
any questions that you have throughout this
interview or the process after the interview.
So if you need to stop to ask me a

1 question, feel free to let me know, or just stop
2 to take a break for the bathroom or some water,
3 I'm happy to -- happy to do that as well for you.
4 And then also if at any point you don't understand
5 the question that I asked you or you just need me
6 to reword it, happy to do that at any time as
7 well. So with that, let's -- I'd like to start
8 just with a little bit of background information
9 about you, [Current Staffer 1]. Can you tell me
10 how you came to work for Representative Mooney?

11 A Sure. I started as a district intern in
12 January of 2020.

13 Q Okay. And what are your -- what's your
14 current position with the office?

15 A Staff assistant.

16 Q Staff assistant. And -- and do you also
17 hold a role on the campaign?

18 A Not at this point. No.

19 Q Okay. Can you take me from when -- have
20 you ever had a role on the campaign?

21 A Yes.

22 Q And -- and was that a paid position?

1 A Yes.

2 Q Okay. Can you just take me from when
3 you started as an intern in 2020 to now and tell
4 me when you had -- when you had an official role,
5 and what that role was, and then also at the same
6 time when you had a campaign role?

7 A Sure. So I started in January 2020 as
8 an intern. I was an intern until the end of July
9 of 2020. So August 2020, I started on the
10 campaign as a campaign assistant, and then I was
11 on the campaign work for the campaign through
12 November, until the end of November. And then
13 beginning of December, I actually went to Georgia
14 to do campaign work until January. And then
15 January 6, I believe, I came back as staff
16 assistant. I'm not for sure on the exact day.

17 Q Okay. January 6, 2021. And so -- so
18 then you have not, at any time, held a campaign
19 position and an official position at the same
20 time?

21 A Uh-uh.

22 Q Okay. So one of the things that I want

1 to talk to you about today or -- or sort of the
2 primary thing that we're going to discuss relates
3 to the -- the sorts of duties that you have in
4 your position as staff assistant. So if you could
5 just generally describe to me your role in the
6 office, that -- that would be great.

7 A Sure. So I assist with lots of office
8 logistics, such as the ordering of supplies and
9 the keeping of logs like when you get packing
10 slips, checking the mail, logging the mail into
11 our correspondence manager. I answer the phone
12 calls and log -- and log those opinions into our
13 system. I work on various projects, like for
14 instance, you know, right now we're doing an
15 academy nomination so I'm helping prepare a
16 package for the review board for that. And then,
17 of course, there's different projects that occur
18 all throughout the session and district projects,
19 like the art competition that I assist staff in
20 those. If there's two events one day and the
21 district rep has to, you know, attend one, I'll
22 cover for the others. It's, you know, a memorial

1 or, you know, ribbon cutting or something like
2 that. So yeah, it -- it really varies. I just
3 assist with whatever projects are currently
4 happening in the office.

5 Q Okay. And -- and where is your office?

6 A Charleston, West Virginia.

7 Q Do you have an office in DC at all? Are
8 you in Charleston full time?

9 A I'm in Charleston full time. I've never
10 been to DC for this one.

11 Q Okay. In -- in your role as staff
12 assistant, do you know who preceded you?

13 A Yes, it is our current office
14 coordinator, Jean Potter.

15 Q Okay. Okay. So the -- the -- the --
16 the duties that you just described to me are --
17 all sounded generally official in nature related
18 to the congressman's work with constituents or in
19 -- in the house. Do you ever perform any duties
20 or have you been asked to perform any duties that
21 are a little more personal in nature, so either
22 assisting the member with family tasks or

1 assisting other members of Representative Mooney's
2 family?

3 A Not on official resources, no. So in my
4 personal time, if it was a volunteer thing, you
5 know, to assist with the campaign --

6 Q Okay.

7 A -- but it was on official time.

8 Q Okay. So then off of official time, can
9 you describe to me the sorts of tasks that you're
10 doing to either help with the campaign or -- or
11 help Representative Mooney's family?

12 A Sure. If it's in the evening, you know,
13 the congressman may be -- may need driven to a
14 county, you know, some sort of event. Or, you
15 know, real -- I don't really do much for the
16 family, but if the congressman is in, I mean, he
17 has any campaign, you know, work that is not
18 during my official time in the office, then I'll
19 just assist in any way that I'm asked to, whether
20 he's setting up for an event, or driving the
21 congressman or, you know, whatever is really
22 asked.

1 Q Okay. And have you ever driven the
2 congressman to or from a personal event, something
3 that wasn't campaign or official related?

4 A Not to my knowledge.

5 Q How about any other members of the
6 family? Have you ever -- let's maybe start with
7 Representative Mooney's children. Have you ever
8 driven Representative Mooney's children anywhere?

9 A Yes.

10 Q Okay. And can you tell me about that.

11 A Sure. That's only happened to my memory
12 on one occasion. And that was when the
13 congressman was doing an official tour of the Clay
14 Center here in Charleston. He met with the
15 president of the Clay Center and then he met with
16 the director of theater to discuss how COVID has
17 affected the operations at the Clay Center and his
18 daughter was with him. And then I just drove them
19 to lunch after. So he did the tour, and then I
20 drove the congressman to lunch after -- after the
21 official event with the daughter in the car, both.

22 Q Okay. But the congressman was with you

1 when -- when that happened?

2 A Yes, sir. Yes, sir. I've never driven
3 them alone, to my knowledge.

4 Q Okay. How about any other staff
5 members? Do you know if any other staff members
6 have performed those sort of duties, driving
7 either Representative Mooney or members of this
8 family to what seemed like a personal event?

9 A No, not to my knowledge.

10 Q Have you ever heard of members of -- or
11 other members of the staff driving Representative
12 Mooney's children to or from school?

13 A No.

14 Q I'm just going to go through kind of a
15 laundry list of things that you might have either
16 done yourself or heard of other staff members
17 doing, and you can just kind of stop me and -- and
18 tell me if you have some -- some detail to add.
19 But I'm going to start with just Representative
20 Mooney's mother, Lala. Do you know Lala? Okay.
21 And --

22 TECHNICIAN: I'm sorry, [Current Staffer 1]

1 --

2 Q -- have you ever been contacted by Lala
3 to help with any -- anything at all, I think, we
4 can start with first?

5 A Yes.

6 Q Okay. What -- what kind of tasks or
7 projects have -- has -- have you helped Lala with?

8 A For one, she was doing -- I think it was
9 -- it was some sort of interview or something that
10 the congressman was meeting with a reporter once
11 and then talking about, I think Cuban relations,
12 of which, of course, the -- you know,
13 congressman's mother is a Cuban immigrant. So he
14 was like, yeah, I'd love to get, you know, your
15 mom's perspective on this, do an interview, and I
16 just assisted in connecting the two for the
17 interview. You know, I can't really think of much
18 off the top of my head honestly.

19 Q Okay. If as we're talking you think of
20 anything else that -- you know, that maybe you
21 forgot previously, just stop me and -- and -- and
22 we can add to those answers. How about Grace

1 Mooney, the congressman's wife? Do you ever --
2 are you ever contacted by Grace to help with any
3 sorts of projects or tasks?

4 TECHNICIAN: I'm sorry, I have to
5 interrupt, Mr. Quinn. A lot of your words,
6 [Current Staffer 1], are not coming through and I
7 want to make sure that the court reporter is getting
8 a clean record of today. Do you have headphones by any
9 chance?

10 THE WITNESS: No, not in my office, but
11 I -- I can speak up if that would help.

12 TECHNICIAN: And it's not when you're
13 saying a full sentence, it's a quick no or yes.
14 The Zoom is not pushing the audio through, but we
15 can see your lips moving so we know what you're
16 saying. The audio just isn't coming through.

17 THE WITNESS: Okay. Sorry about that.
18 I will be more clear.

19 TECHNICIAN: Not a problem at all,
20 [Current Staffer 1].

21 BY MR. QUINN:

22 Q So sorry, just to ask you one more time.

1 You said -- I think you said that you haven't been
2 contacted by Representative Mooney's wife to help
3 with any tasks or projects; is that correct?

4 A Correct.

5 Q How about any other members of
6 Representative Mooney's staff? Have you heard
7 anybody talking about doing work, tasks, any sorts
8 of projects for Lala or the Representative's wife?

9 A Not to my immediate knowledge that I
10 know.

11 Q Okay. How about watching any of the --
12 the congressman's children? Have you or have you
13 heard of any other staff members helping the
14 congressman watch the children?

15 A No. I have never been with the children
16 without the congressman present.

17 Q Sorry. I'm just going to keep moving
18 through this list. We just got a few things to
19 check through. How about picking up the medicine?
20 Have you ever picked up the congressman's medicine
21 or heard of any other staff members picking up his
22 medicine?

1 A No.

2 Q Okay. And how about groceries?

3 A No.

4 Q Okay. Are -- are you familiar with any
5 of -- any of the work that Representative Mooney's
6 wife does? So I -- I believe she might have a
7 consulting business that's related to her medical
8 practice. Are you aware of that?

9 A No.

10 Q Okay. Just another type of task. Have
11 you ever heard of any staff members helping the
12 Mooneys with tasks related to their personal
13 vehicles? So I can be more specific, but if
14 you've got a general idea --

15 A Could -- could you be more specific?

16 Q Sure. So some examples could be either
17 helping Representative Mooney or his family get a
18 private vehicle titled in West Virginia, maybe
19 taking the vehicle for inspection, or having
20 repairs done to a private vehicle?

21 A The only incident that I believe might
22 fit for what you're looking for is a previous

1 staff member, you know, had helped in a couple of
2 like, small scale auto repairs that was, you know,
3 to get him to DC. But that would be the only
4 instance that I can think of. I mean, no, nobody
5 has gone to the DMV or anything.

6 Q And who -- who's that that would have
7 helped with that?

8 A Rainer, R -- I don't know how to spell
9 it, but I know it's Rainer.

10 Q Okay. I think for the court reporter, I
11 believe it's R-A-I-N-E-R. And that's Rainer
12 Kissell; right?

13 A Yes, sir.

14 Q Okay. And what -- can you just tell me
15 one more time, what do you know of that -- what
16 sort of work was Rainer doing on the cars?

17 A I know really no specifics at all other
18 than I've heard him mention that, you know, the
19 congressman was trying to get to DC. The car had
20 an issue. So, you know, Rainer staffing him at
21 the time, just -- he kind of used some West
22 Virginia ingenuity to get it running again.

1 Q Okay. And then I just want to make sure
2 I understood something previously you said. You
3 said your office is in Charleston. You're in
4 Charleston, not Charlestown; correct?

5 A Yeah. Charleston.

6 Q Okay. Okay. Got it. The capital.

7 A Yeah. That's usually --

8 Q Yeah. Sometimes I can't hear the
9 difference and -- and people, you know --

10 A Yeah.

11 Q -- combine the two words. Okay. How
12 about any tasks either that you've completed or
13 heard of staff completing related to the
14 congressman's dog, like, either dog sitting or
15 traveling with the dog from point A to point B?

16 A No. You know, I'm coming up two years
17 and I didn't know he had a dog to be honest with
18 you. This is news to me, so --

19 Q Okay. And then how about the
20 Congressman's laundry? Have you ever dealt with
21 his laundry or-- or helped other staff deal with
22 the laundry?

1 THE REPORTER: I'm sorry, I didn't catch
2 that, sir. I couldn't hear you -- your response.

3 THE WITNESS: No.

4 THE REPORTER: I got it again. No.
5 Okay. Thank you.

6 Q Did you ever work with Former Staffer 3 [REDACTED]?

7 A Yes.

8 Q Okay. In any of the sorts of tasks that
9 we've just talked about, have you ever discussed
10 any of those sorts of tasks with Former [REDACTED] or heard
11 of Former [REDACTED] doing those sorts of tasks?
12 of Staffer 3

12 A No.

13 Q Then another thing I want to talk about
14 quickly is just a couple of different trips that I
15 know the Congressman has taken, and I loved to
16 know any details you know about these trips. The
17 first one is a trip to Aruba in March of this
18 year. Are you familiar with that -- that trip?

19 A No.

20 Q Okay. And then the other trip I want to
21 ask you about is a -- it was an early August trip
22 of this year, to Blennerhassett Island. I might

1 not be pronouncing that correctly. Does that ring
2 a bell?

3 A Yes.

4 Q Okay. What was -- can you tell me the
5 purpose of that -- that trip?

6 A I didn't have anything to do with the
7 trip to Blennerhassett Island. That was, I
8 believe, the Congressman's affairs. I was going
9 because he had a media interview with the
10 Parkersburg Times, I believe, or the local
11 newspaper, and he also met with a small business
12 owner in that area.

13 Q Maybe let's step back a little bit. I
14 -- I understand it was a -- a multi-day trip where
15 there were a couple events planned back-to-back;
16 is that correct?

17 A Yes.

18 Q Okay. To the extent you remember, can
19 you tell me when the trip started and then just
20 kind of take me through the events that -- that
21 you can remember.

22 A Sure. I drove to Parkersburg. I

1 believe it was -- I got there around 9:30, I
2 think, because I had some details worked out with
3 the media interview. And then it was my first
4 trip to Parkersburg so I had to orient myself with
5 the area as I would be, you know, taking the
6 Congressman through his destinations. So I drove
7 to Parkersburg, ate breakfast, I went and visited
8 the newspaper, and I drove to the Burger King to
9 pretty much see where it's at, scouted out the
10 location as is commonly done. And then I picked
11 up the Congressman from the island, the parking
12 areas, you know, city property outside of the
13 Island. And we went to the Burger King from the
14 small business meeting first and then to the
15 paper, I believe.

16 BY MR. QUINN:

17 Q And do you recall what day this was?

18 A I don't -- I don't.

19 Q Sometime in early August, though?

20 A Yes.

21 Q And then you mentioned that you knew the
22 Congressman had gone to Blennerhassett Island and

1 you picked him up from there, but you said, I
2 think, and correct me if I'm wrong, you said that
3 you weren't too familiar with that stop because it
4 was the Congressman's affairs. Is that what you
5 said?

6 A Yes. I believe I just -- I didn't go on
7 the island or, you know, the boat ride, I didn't
8 -- I don't really know anything about that.

9 Q Okay. But did you -- were you aware of
10 any official stops or activities or -- or did you
11 understand that to be a -- a personal stop?

12 A I wasn't aware of that portion of the
13 schedule. I was just, you know, given the project
14 of managing the interview stop and the Burger King
15 stop and anything other than that will be the
16 scheduling.

17 Q Okay. And then so you staffed him for
18 the Parkersburg Newspaper; is that correct?

19 A Yes. There were there was an interview
20 at Burger King, too, and then he also spoke to the
21 employees at the franchise. And then, of course,
22 he met with the owner or manager of the franchise

1 one, did the interview outside, and then we went
2 to the Parkersburg Time, had a sit-down interview
3 with the editor there. And then back.

4 Q Okay. Was the -- the interview at the
5 Burger King was also with the newspaper, the same
6 newspaper?

7 A No. No. So the Parkersburg Times was
8 the -- the newspaper interview and the one at the
9 Burger King was whatever the local cable affiliate
10 is, WKN TV or something like that.

11 Q Okay. And is Parkersburg in the
12 Congressman's current district?

13 A No.

14 Q Okay. Was that ever discussed or do you
15 know why the Congressman was leaving his district
16 for that trip?

17 A No, sir.

18 Q And do you know who -- who primarily
19 plans -- let's actually take the -- the -- we'll
20 take the newspaper and the small business meeting
21 separately. Do you know who planned the small
22 business meeting or who had that idea?

1 A No. So the person handling scheduling
2 at the time just informed me to add to my planning
3 for that event, that he would be meeting with the
4 gentleman, you know, at the Burger King and that
5 was it.

6 Q Okay. And -- and who was this -- this
7 gentleman?

8 A I know it was the owner of the Burger
9 King. I can't remember his name or anything or
10 really anything else. Oftentimes --

11 Q Was it -- was it Matthew Herage
12 (phonetic). Does that ring a bell?

13 A Yes.

14 Q Okay. Do you know -- do you know how
15 the Congressman knows Matthew Herage?

16 A No, other than Burger King.

17 Q And then let's talk about the newspaper
18 interview and -- and that meeting. Do you know
19 anything more about that? Do you know who set
20 that up or whose idea that -- that stop was?

21 A No, I do not.

22 Q And then lastly, are you aware of any

1 communications with the Ethics Committee related
2 to this trip to Parkersburg?

3 A No.

4 Q Let's talk a little bit about some of
5 the work that you do or have done for that
6 campaign. Can you go back to telling me once
7 again, and I know you already said that, just
8 refresh my recollection. What was the period of
9 time that you were working exclusively on the
10 campaign?

11 A At the beginning of August to the end of
12 November of 2012.

13 Q Okay. And then outside of that time or
14 after November and currently, you said that you
15 just help in your off time or volunteer in your
16 off time with whatever campaign tasks come up at
17 that time?

18 A Yes, sir.

19 Q Okay. So I may take those two
20 separately. One, the period of time where you
21 worked full time for the campaign and then -- and
22 then currently and just kind of as you do one-off

1 tasks for the campaign. When you were working
2 full time for the campaign, can you tell me what
3 your primary duties were?

4 A Door knocking, I guess would be the
5 primary thing that I did. I managed yard signage.
6 So our yard signs, enlarge signs. I place those
7 throughout the four counties that were
8 coordinated. I represented the campaign at
9 political events such as County Republican
10 committee events or things like that. That --
11 that was primary it -- primarily it, normal. And
12 then again, there will be different, you know,
13 sort of things. So if there's a parade coming up,
14 then I would help kind of do whatever needs done
15 for the parade or if, you know, there was the
16 election day was coming up. I do some sign
17 waiving. I just primary activity -- primary
18 campaign activities.

19 Q Okay. Talking about the yard signs for
20 a second. Can you tell me where the yard signs
21 are stored?

22 A During the campaign, the majority were

1 -- for my area were in my garage. The rest are
2 presumably in nation Panhandle.

3 Q Okay. Right. Because you were in
4 Charleston. Got you. And then let's focus on
5 sort of more present during that period of time
6 that you were also employed by the official
7 campaign. Can you describe the sorts of tasks
8 that you do now for the campaign.

9 A Really nothing. I haven't really done
10 anything recently that I can even remember. In
11 the evening once, you know, I drove the
12 Congressman to an event that was campaign oriented
13 in the evening following my shift and that's it
14 really.

15 Q And then moving on from -- from that
16 topic, I wanted to ask you about a company that
17 the Congressman and his campaign use for direct
18 mailing services. So sending -- sending out mail
19 to fundraising mail or -- or informational mail to
20 constituents. Do you know what company the
21 campaign uses for that -- for that service?

22 A No.

1 Q Have you ever heard of HSP Direct?

2 A No.

3 Q I also wanted to ask you about planning
4 for the Congressman's birthday party this past
5 year. Were you involved in that at all?

6 A In planning for the party?

7 Q Short planning or how about did you help
8 staff the events or do any sort of work related to
9 the Congressman's birthday party?

10 A Yes.

11 Q Okay. Can you tell me what you did?

12 A I was just there the day of and put up
13 streamers and made sign-in sheets and kind of was
14 just there.

15 Q Okay. And when was that event?

16 A June 6th, I want to say, but I'm not for
17 sure.

18 Q Okay. Do you know if that was a weekday
19 or weekend?

20 A It was certainly a weekend.

21 Q Weekend. Okay. It looks like June 6th
22 was Sunday. Does that sound right? I'm sorry,

1 maybe I missed your response, I said it looks like
2 June the 6th was a Sunday. Do -- do that -- does
3 that sound right?

4 A Yes.

5 Q Okay. No problem. And so did you
6 consider your assistance with that event to be
7 volunteer tasks or was that related to your
8 official duties?

9 A 100 percent volunteer.

10 Q Okay. Was that event also a fundraiser?

11 A I believe. Yes, it was.

12 Q It was, okay. How did you know that was
13 a fundraiser?

14 A They were collecting money.

15 Q Pretty good indication that's a
16 fundraising, I guess. Do you know who else was
17 helping staff that event?

18 A No. I wouldn't say anyone was staffing
19 the events.

20 Q Or volunteering just to staff the event?

21 A I can try. So I was there -- actually
22 our -- hold on, I'm trying to remember. I'm

1 sorry. They leave --

2 Q It's okay. Take your time.

3 THE REPORTER: [Current Staffer 1], that --
4 that entire portion of what you said didn't come
5 through?

6 THE WITNESS: I'm sorry. I said --
7 well, I said that I was thinking. Then I said
8 Blake. Blake was the district intern at the time.
9 Is it coming through now audiowise?

10 THE REPORTER: It is. Thank you.

11 A Okay. Yes. So that was Blake. I can't
12 remember the last name. Susie in our office was
13 there but left practically after she arrived
14 because she was ill. She ended up being ill.
15 Mike was there. But I'm not sure he was
16 volunteering. I don't -- he might have just kind
17 of been there, you know, at the party.

18 Q Mike Hough?

19 A Yes, sir, the chief.

20 Q Okay.

21 A I mean, who -- is there -- is there like
22 a certain group of people you're looking for

1 because like the Congressman's mother was there,
2 the Congressman's siblings were there.

3 Q I'm interested in either official staff
4 or campaign staff that were doing work there.
5 Like, so you described that you helped set up the
6 party and I think that you said you were taking
7 down names or -- or checking off guests that had
8 arrived. Who else was doing that sort of work?

9 A Myself, Blake, Susie, but she left sick,
10 Mike, that was -- that was it.

11 Q Okay. Was Ashley Phillips there?

12 A No.

13 Q Was she still working for the
14 Congressman at that time?

15 A I do not remember.

16 MR. QUINN: Okay. Okay. Let's,
17 actually, if we can take a break for just a few
18 minutes, this might be a very quick interview. We
19 might be pretty close to done. I just want to
20 take a couple of minutes and go over some notes
21 and see if we have anything else to talk about,
22 but we might be getting pretty close. So let's

1 take -- let's take five minutes, actually a little
2 more. Let's come back at 10:55. And then
3 hopefully right after that, we can wrap up.

4 THE WITNESS: Okay.

5 MR. QUINN: Okay. So we can go off the
6 record.

7 THE REPORTER: Yep. Off the record at
8 10.48.

9 (Whereupon, there was a discussion off
10 the record.)

11 THE REPORTER: Back on the record at
12 10:56.

13 BY MR. QUINN:

14 Q Sure. Okay. One thing I did want to
15 ask you about is mileage when you're driving
16 either for the official office or for the
17 campaign. And I want to take the official office
18 or official work first. When you drive either the
19 Congressman when he's in town or drive yourself
20 for official work, how -- or -- or do you claim
21 mileage for that driving?

22 A Yes, I claim it on my expense

1 reimbursement form, just by however many miles,
2 you know. I list the to and from destinations and
3 stuff, as well as the mileage and they reimburse
4 me the following month.

5 Q Okay. And have you ever had the
6 Congressman pay you personally for either gas or
7 miles driven?

8 A No.

9 Q Okay. And is that the same for campaign
10 mileage? How do you --

11 A I just -- I just --

12 Q -- pay for that?

13 A -- pay for gas with my card.

14 Q I'm sorry, say that one more time.

15 A I just purchase gas with the cards.

16 Q And like -- and which cards are you
17 referring to?

18 A Like that's how I -- like if -- like for
19 instance, if I was planning a parade and like any
20 money I needed for the campaign to buy stakes or
21 signs or if I had business cards or gas to get to
22 an event, I just used like -- like a gift card but

1 for anywhere, I guess, that they just sent --

2 Q Like a pre --

3 A Yeah. And I just gave receipts --

4 Q Go ahead, I'm sorry.

5 A -- to Sophia, and I would, like, mark
6 down everything. So I drove -- where I drove to,
7 what expenses I used. And then when the card was
8 gone, like, you know, they usually come in small
9 increments. I just send the card and the list of
10 what I used and all the receipts back to Sophia at
11 the time.

12 Q Okay. And that's like a -- like a
13 prepaid Visa card or -- or something like that?

14 A Yeah.

15 Q Okay.

16 A I just -- I just didn't have a debit
17 card and to prevent having to, like, deal with
18 cash and everything, it was just easier, I guess.

19 Q Okay. And then were you involved at all
20 in collecting documents or helping the Congressman
21 respond to requests that my office had in the
22 first review that was conducted and started in

1 March of this year?

2 A No. I mean, other than, I mean, I -- of
3 course, I received things saying not to throw
4 anything away, but I didn't help him prepare for
5 anything.

6 Q When was that? When did you receive
7 that notice?

8 A I'm not for sure. Let's say the first
9 was in April, but that -- that's a loose guess.

10 Q Okay. And then, also, do you know or
11 recognize the name Former Staffer 5 ?

12 A No.

13 Q Okay. And then, I think we're done with
14 basically the substantive questions. I just want
15 to ask you a couple of questions about anything
16 that you did to prepare for the interview today.
17 So did you review any documents in order to
18 prepare for our interview today?

19 A No.

20 Q Okay. Did you speak to anybody to
21 prepare for the interview?

22 A No.

1 Q Okay. So nobody in either the
2 Congressman's office or any attorneys?

3 A No. I mean, not to prepare, no.

4 Q Okay. Did you speak to anybody else
5 about this interview?

6 A I just, you know, made my immediate
7 supervisor aware that that's why I'd be
8 unavailable, but that's it.

9 MR. QUINN: Okay. All right. Got you.
10 Then I think we are done here. Annie, unless you
11 have any other questions?

12 MS. CHO: No, I'm good.

13 MR. QUINN: Great. Okay. And I'm glad
14 I could make it on my promise to finish in an
15 hour. But with that, we can go off the record.

16 (Off the record at 11:00 a.m.)
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CERTIFICATE OF COURT REPORTER

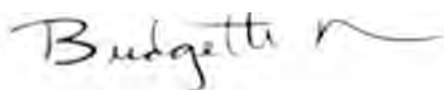
I, Sue Pybas, the officer before whom
the foregoing proceedings were taken, do hereby
certify that said proceedings were electronically
recorded by me; and that I am neither counsel for,
related to, nor employed by any of the parties to
this case and have no interest, financial or
otherwise, in its outcome.



Sue Pybas, Court Reporter

CERTIFICATION OF TRANSCRIPT

I, Bridgette Rast, do hereby certify that the foregoing transcript, to the best of my ability, knowledge, and belief, is a true and correct record of the proceedings; that said proceedings were reduced to typewriting under my supervision; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.



Bridgette Rast
Planet Depos, LLC
November 8, 2021

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

[illegible]

Witness Name:

Witness Signature:

Date:

[REDACTED]

11 | 12 | 2021

EXHIBIT 7

Transcript of Interview of Current Staffer 2

Review No. 21-6998

October 1, 2021

OFFICE OF CONGRESSIONAL ETHICS
OF THE U.S. HOUSE OF REPRESENTATIVES

-----x

In re: CURRENT STAFFER 2, : OCE Review No:
: 21-6998

-----x

Interview of CURRENT STAFFER 2

Conducted Virtually

Friday, October 1, 2021

10:02 a.m. EST

Job No. 403238

Page: 1 - 109

Transcribed by: Kevin Kiser

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

2

1 Interview of CURRENT STAFFER 2, conducted
2 virtually.

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14 Pursuant to agreement, before Kevin Kiser,
15 Notary Public in and for the Commonwealth of
16 Virginia

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A P P E A R A N C E S

ON BEHALF OF OFFICE OF CONGRESSIONAL ETHICS:

SEAN M. QUINN, ESQUIRE

ANNIE CHO, EQUIRE

HOUSE OF REPRESENTATIVES

425 3rd Street, Southwest, Suite 11100

Washington, DC 20024

202.225.9739

ALSO PRESENT:

CARL HELLANDSJO, TECHNICIAN

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C O N T E N T S

EXAMINATION OF CURRENT STAFFER 2	PAGE
By Mr. Quinn	7

E X H I B I T S

(Attached to transcript.)

INTERVIEW EXHIBITS	PAGE
Exhibit A Calendar Notification	22
Exhibit B Trip Planning Document	27

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

5

1 P R O C E E D I N G S

2 MR. QUINN: Great, thanks for all. And
3 then I just have a quick little read on myself
4 just for the record.

5 So today is October 1st, 2021, and we're
6 conducting the interview of Current Staffer 2 by Zoom. Current Staffer 2
7 Staffer 2 is not represented today speaking as Sean Quinn,
8 investigative counsel at the Office of
9 Congressional Ethics, and I'm here with Annie Cho,
10 also at the OCE.

11 The witness has been given a copy of 18
12 USC 1001, and has signed the acknowledgment, and
13 actually while we're on that point, Current Staffer 2, did you
14 have any questions about the false statements act
15 or that acknowledgment form --

16 THE WITNESS: No.

17 MR. QUINN: -- that you sent me?

18 THE WITNESS: Not really --

19 MR. QUINN: Okay.

20 THE WITNESS: It's -- it's for the
21 traditional legislative jargon. It was hard, but
22 it was pretty understandable.

1 MR. QUINN: Yeah. I'm sure you're
2 familiar with the acts of the basics, just that we
3 have to let everybody know so --

4 THE WITNESS: Sure.

5 MR. QUINN: -- that all statements act
6 makes it illegal to -- to lie, or make a material
7 omission to a congress -- congressional
8 investigator like myself.

9 THE WITNESS: And I just wanted to go --

10 MR. QUINN: So with that being said --

11 THE WITNESS: I'm -- I'm sorry. I just
12 wanted to point out to I'm here in the office by
13 myself today, so there's nobody else even in the
14 -- in our office suite here, so I'm totally alone.

15 MR. QUINN: Okay -- okay. Great.
16 That's good to know. And then also I'll say
17 thanks very much for your time this morning. We
18 appreciate it, I'm sure you're -- I'm sure you're
19 busy especially now in Congress, so it's pretty
20 much appreciated. And then also throughout our
21 time talking, if you have any questions for me
22 feel free to stop me or if you don't understand

1 the question that I've asked you, I can repeat it
2 or reword it, or if you just need a break for
3 water or bathroom. Feel free to stop me at
4 any point.

5 THE WITNESS: Thank you so much.

6 MR. QUINN: And then, yeah -- and then,
7 lastly, since we do have somebody transcribing
8 everything we're saying, let's just try not to
9 talk over each other. Makes it very hard to type
10 when two people are talking at the same time, so I
11 'll do my best and -- and then also, Kevin, if we
12 start talking too fast, just -- just let us know
13 and slow us down.

14 And -- and I think with that I'll just
15 ask, normally we start with a couple of questions
16 just kind of about what you did, if anything, to
17 prepare to talk to us today, so I don't know if
18 you spoke to anybody else or maybe looked at some
19 documents or look back to -- back at any notes.

20 BY COUNSEL FOR THE OFFICE OF CONGRESSIONAL ETHICS

21 BY MR. QUINN:

22 Q Was there anything at all that you did

1 today to, or that you've done recently to prepare
2 for this interview?

3 A No. The only thing that I really --
4 really did was contact the -- the attorney that
5 the office had said was available, made a phone
6 call, but the individual call was never returned
7 --

8 Q Okay.

9 A -- so not really, no.

10 Q Okay. And was that -- that was Rob
11 Walker?

12 A Yes.

13 Q Okay. Great. And then -- and you
14 haven't talked to anybody else about -- about
15 those CE interview?

16 A The only one I think I've ever talked to
17 is my fellow District Director. I mentioned it to
18 her that I was going to be interviewed, Jean
19 Potter, and then I also mentioned it to my former
20 boss who you've interviewed before a [Former Staffer 1].

21 Q Okay. Great. How about Representative
22 Mooney or Michael Hough? Have you talked to

1 either of them about this?

2 A I -- I did mention to them that I --
3 that was being Monday when I first found out about
4 it, Michael told me that he was actually in the
5 room with the congressman at the time so I'm
6 assuming they're both aware of this taking place
7 today.

8 Q Okay. Great. And did Michael say
9 anything to you about the interview or just noted
10 that you'd be participating?

11 A Yeah. Yeah. I mean, basically it was
12 just, you know, he resent out to the -- the one
13 form about keeping our records and everything and
14 then he also, you know, just said, Hey, be
15 straightforward kind of thing, you know, pretty
16 vague, nothing. No -- no questions really at all.
17 So --

18 Q Okay -- okay. Good to know. Great.
19 Then why don't we talk a little bit just about
20 your background and -- and what you do for
21 Representative Mooney.

22 A Uh-huh.

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

10

1 Q Can you tell me when you started working
2 for Representative Mooney?

3 A It would have been the end of February
4 2019, that I came onboard here to be a district
5 representative in the Martinsburg office to kind
6 of work on issues in the eastern part of the
7 Second District of West Virginia. And then as my
8 time here has evolved because of my previous
9 history and work, I was given a title of Economic
10 Development and Outreach to liaison. So that's my
11 -- my role now and since [Former Staffer 1] left in June, Jeanne
12 and I have assumed sort of core District Director
13 roles.

14 I'm working with the -- the field reps
15 and she's working with the case management stuff
16 that goes on with the office primarily. So that's
17 kind of been the -- the split of duties, of
18 course, with the district this size, the
19 Charleston office, it's six hours away from the
20 Martinsburg office and so sometimes logistics can
21 be a little difficult, but it is what it is.

22 Q Right. And I think you said that you

1 are -- you are in the Martinsburg office; right?

2 A That's correct. Yeah. I live in
3 Jefferson County, West Virginia.

4 And again, my background, I was involved
5 with the Appalachian Regional Commission for 17
6 years in DC, and prior to that, I'm -- I'm
7 originally from Ohio and worked with the
8 Appalachian Program in Ohio both at the -- the
9 regional and state level so, I don't know, full
10 background was local economic development, rural
11 development in Appalachian, so that's why I
12 applied for the job to begin with it kind of -- it
13 kind of fit some of the things I used to do and
14 kind of gave me something during my, I guess, semi
15 retirement.

16 Q Right. Okay. Yeah. Sounds like a good
17 -- like a good fit.

18 A Yeah.

19 Q Can you -- other than just having that
20 general background that was kind of a good fit for
21 the position. Can you tell me how you came to
22 work for Representative Mooney?

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

12

1 A In all honestly, I saw an ad in the
2 Martinsburg Journal, I mean, the old-school stuff
3 and, like, you know, no LinkedIn or any other
4 sort of on -- on-site sort of job recruitment is a
5 traditional old ad and the paper that I responded
6 to and, you know, applied for the job back, it's
7 probably January of '19 and, quite frankly, the
8 reason I decided to work with the congressman
9 because I'm a conservative person myself, we
10 aligned pretty well with views on a whole host of
11 things that tend to be more conservative in
12 nature, so I -- I -- I couldn't see myself working
13 for somebody that didn't agree with on most
14 issues.

15 Q Okay. Let's go through just quickly a
16 little bit of the reporting structure in your
17 office --

18 A Uh-huh.

19 Q -- who did you report to?

20 A Well, again, since [Former Staffer 1] left the office
21 in June, I really report to Mike -- Michael
22 Hough's and -- and Jean Potter and I try to

1 coordinate our -- our work together as much as we
2 can, we talk on a fairly regular basis as well.

3 Q Okay. And Jeanne is in the -- the
4 Charleston office?

5 A That's correct. That's correct.

6 Q And then who reports to you?

7 A Primarily, Susie Acevedo as a district
8 rep out of the Charleston office and then Rhett
9 Dusenbury is kind of a -- he's out of Elkins and
10 so he's -- he's not on either office, he's sort of
11 operates out of his homes for that central part of
12 the -- and then I guess sort of technically the
13 manager of the Martinsburg office, and Jeanne's
14 the manager at the Charleston office, too. So --

15 Q Okay. Great. So -- so that's the
16 official side. Have you ever worked or done any
17 work for the campaign?

18 A A couple of minor things. I picked the
19 congressman up last summer, not this summer, but
20 the previous summer on my off time I've done,
21 like, a parade the first year in Ripley and -- and
22 Hurricane and even when I picked up the

1 congressman that was on, you know, off time, too.
2 So there are a very few campaign activities, quite
3 frankly. Most of it, it's been visits, and there
4 had been very few of those, quite frankly, too,
5 so, you know, stops in the district and stuff.

6 Q And when you say picked up the
7 congressman, you just -- you mean you drove him to
8 and from the event?

9 A Yeah. Yeah, he was at a --

10 Q Okay.

11 A -- at a meeting in -- in Southwestern
12 Pennsylvania back in I think it was July of '20
13 and it was, I think it was a congressional
14 Republican event meeting and the gentleman that
15 usually does that work his mother-in-law passed
16 away and they needed somebody to go pick the
17 congressman up and so I said sure I can do it.
18 And then instead of being paid as a normal process
19 of reimbursement, actually, the congressman paid
20 me with a personal check, so --

21 Q Okay.

22 A -- for the mileage and everything.

1 Q Okay. So in that case, instead of --
2 instead of submitting a mileage claim to the -- to
3 the campaign the congressman paid you directly for
4 the -- for the mileage to you?

5 A That's my recollection.

6 Q Okay. Do you know -- do you know if he
7 then submitted a mileage request?

8 A I have no --

9 Q -- or do you know how that worked?

10 A I have -- I have no idea, yeah. I have
11 no idea how that worked.

12 Q Okay. And then you -- you had mentioned
13 that the person who would normally do that had a
14 family emergency, who -- who is the person that
15 would normally do that?

16 A His name is Ranier Kissel. Ranier has
17 since retired at the end of last year but he
18 typically did at least some of -- of the driving
19 for the congressman, you know, depending upon the
20 circumstances and situation.

21 Q Okay. And did he have a title with the
22 campaign or the official office?

1 A You know, I'm sure he did. I'm not
2 recalling exactly what it was. He was a part-time
3 employee when I came on board and then also did --
4 he -- he did more things on the campaign side, too,
5 see, he was kind of split in nature, so I -- I
6 really can't with -- with full extent of any real
7 knowledge sort of say how that worked. I just
8 knew he was an employee.

9 Q Okay. Got you. Okay. We can -- we'll
10 start talking about some of the more specific
11 things that we're looking at. One of the things I
12 wanted to ask you about is a trip from this year
13 in early August. I think it was August 2nd to
14 August 5th. Do you -- do you know what trip I'm
15 talking about?

16 A I know I met the congressman and his
17 wife and daughter in Moorefield High School for an
18 event there the Governors Art Caravan, I believe
19 it was called and we -- I staffed him at that
20 event and then we had lunch afterwards in
21 Moorefield.

22 Q And that was on the -- do you -- do you

1 recall that day that was the second?

2 A I believe it was the second, yeah. In
3 fact I had just submitted my expense report and
4 had that on there. So I could look that up for
5 you real quick if you like.

6 Q That's fine I actually I have a document
7 or two we can look out to kind of --

8 A Okay.

9 Q -- nail down dates if we need -- need to
10 do that. But my impression from other folks that
11 we've talked to and -- and document that I've seen
12 is that it was like a -- it was a couple of day
13 trip maybe or there at least a few things plan,
14 for example, there was a visit to -- I'm not sure
15 I'm saying this correctly Blennerhassett Island.
16 Is that how you say that?

17 A Yeah. Yeah. That's how you say it.

18 Q Okay. Okay.

19 A That -- that was my understanding --

20 Q Do you --

21 A -- too, Sean -- I'm sorry.

22 Q Okay. Go ahead.

1 A Charleston after that point and
2 goodness, I think the congressman was leaving out
3 of Charleston and his wife and daughter was
4 staying or something like that, but I wasn't sure
5 and I know they were trip up there to Wood County
6 and -- and Blennerhassett Island, this historic
7 site, if you will. I don't know if you -- how
8 much you get into the US history, but it was --
9 there's a book called The Pioneers that -- that
10 I've read that sort of documents, the settling of
11 the Northwest Territory, and Blennerhassett was
12 part of that discussion. So --

13 Q -- anyway, I'm going off in other woods
14 a little bit --

15 A Right.

16 Q But it's -- it's the right book.

17 A My lights have just shut off here so I
18 was just trying to --

19 Q Okay. And Blennerhassett Island just so
20 I can get the geography down in -- in Wood County,
21 is --

22 A Yeah. It's -- it's on Ohio River.

1 Q Okay.

2 A I believe it would be considered Wood
3 County, right. Parkers -- Parkersburg Wood
4 County, correct.

5 Q Okay. And there was also part of this
6 trip, was a -- was there a meeting with or
7 interview with folks in the -- at the Parkersburg
8 newspaper, do you recall that?

9 A That was my understanding that that was
10 going to take place whether it took place or not,
11 I'm not sure, but my understanding was they were
12 -- they were setting something for that to take
13 place.

14 Q Okay. So I think we're talking about
15 the same trip or at least we --

16 A Yeah.

17 Q -- we believe --

18 A I believe we --

19 Q -- aired that out. Are -- were you
20 involved in planning any of the various stops on
21 that -- that kind of multi-day tour?

22 A No, I don't think I did. Like I said,

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

20

1 they had already said I picked up at Governor's
2 Art Caravan stop and I was just asked to staff him
3 there at that event, so that was the only role I
4 really played in that process. Yeah. Typically
5 when -- when there are visits by the congressman
6 to the -- to the district in the past, [Former Staffer 1] had
7 handled those. And since his departure, I would
8 work on things in this part of the district and
9 then the Charleston office would work on, you
10 know, those types of trips as well.

11 Q Okay, there were two other stops that
12 I've seen kind of associated with multi-day today
13 trip that I wanted to ask you about and see if --

14 A Uh-huh.

15 Q -- you knew anything about it. If you
16 don't know anything about it just say so. One was
17 a meeting with somebody named Matthew Herridge.
18 Do you know -- are you familiar with that meeting
19 or do you know who that is?

20 A No, I don't believe so.

21 Q Okay.

22 A Name doesn't ring a bell.

1 Q I had -- oh, sorry. Go ahead.

2 A No, I just said that -- that name
3 doesn't -- doesn't sound familiar to me.

4 Q Okay. Let's see. I had -- if we can
5 pull up -- let's see. Carl, if we can pull up tab
6 2. So I was asking you about it, Current Staffer 2, just
7 because we had some folks produce some documents
8 to us and -- and one of them was a calendar invite
9 with -- or setting up a meeting with this
10 individual named Matthew Herridge, and it looked
11 like, from the calendar invite, you were the point
12 of contact for him, so I'll -- I'll just show that
13 to real quick and you can --

14 A Yeah, please do. Because maybe I'm just
15 forgetting something.

16 Q Yeah. Let's see. So just for the
17 record, so that we can tell where -- oh, and,
18 Carl, you can mark this as Exhibit A. And this is
19 a calendar notification on Gmail titled, meet with
20 Matthew Herridge at -- on Thursday, August 5th,
21 2021, 3:30 to 4:30, and it looks like this
22 particular update was sent on July 30th, 2021, at

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

22

1 3:05. And I don't know or -- I don't know if this
2 went to you or not, Current Staffer 2. This was from another
3 individual.

4 (Exhibit A was marked.)

5 A Yeah. I --

6 Q But it says, and so you can see that,
7 Current Staffer 2 is --

8 A Yeah.

9 Q -- contacting Matt Herridge to set up a
10 time and location.

11 A I think there was some --

12 Q Do you recall that or --

13 A -- there was some going back and forth
14 about some of the meetings, and I kind of bowed
15 out of setting things up like that because I had
16 no idea who these people were, so I think other
17 people kind of picked up the ball. I think that
18 may have been initially their thinking in the
19 office, but I don't recall that e-mail. I can
20 look in my -- my personal Gmail to see if I have
21 it. It's -- I see it's July 30th. Like I say, I
22 -- I did not set up any meetings. I never

1 contacted Matt --

2 Q Okay.

3 A -- Herridge, to my recollection, at all.

4 Is he a reporter --

5 Q Okay.

6 A -- or do you know?

7 Q I think he's just a -- a private
8 individual, not a reporter.

9 A Well, I know there was talk about Burger
10 King owner or something like that. Is -- is that
11 that --

12 Q That's -- that's who I think it is.
13 Yeah.

14 A Okay. Yeah. That -- [Current Staffer 1]
15 probably is the one who made the -- find -- made
16 the appointment with him, I'm thinking.

17 Q Okay.

18 A If you go to the Charleston office.

19 Q Okay. Got it. Yeah. I'm sure these
20 things are -- are pretty fluid.

21 A Yeah.

22 Q So I had just seen this, so I thought

1 you might be the person to ask about it, but we
2 will -- we can move on from that.

3 A And that's not -- that was my
4 understanding, that that -- and that he was either
5 an influential Republican or a donor or something,
6 but I had -- I had no -- no clue about that and
7 who set what up when.

8 Q Okay.

9 A I know they had -- they had talked about
10 me, as I recall, contacting some folks, and it's
11 like, I don't know anybody over there in that part
12 of the states, so, you know.

13 Q Right. And -- and then is -- so
14 Blennerhassett Island and Wood County and
15 Parkersburg are -- they are not in Representative
16 Mooney's district; is that right?

17 A They -- they -- they are not, no. No.

18 Q Okay.

19 A Wood County is north of -- of the
20 border.

21 Q Okay. Do you recall, as planning for
22 this -- these trips were going on, if there was

1 any discussion about that, especially about the
2 fact that the -- these stops weren't in
3 Representative Mooney's district?

4 A And -- and this is an assumption on my
5 behalf. I know, again, the -- the newspaper has
6 coverage in parts of the district, you know, down
7 into Wirt County, Calhoun County probably, Roane
8 County maybe, also Park -- Parkersburg --

9 Q Okay.

10 A -- is kind of a more central city for
11 that part of the state. So there would be
12 coverage from that paper, but, you know, the fact
13 of the matter is with redistricting coming up,
14 too, I -- I think there was probably -- and,
15 again, I'm making an assumption here and trying to
16 just understand the politics of it all. Trying to
17 get more exposure in that part of the state would
18 probably be a logical assumption to make.

19 Q Okay. And is that -- that's
20 representing McKinley's district; correct?

21 A That's correct, yeah.

22 Q Okay. Okay. One other stop that looks

1 like it was on the schedule for this August 2nd to
2 August 5th period was a trip to The Greenbrier. I
3 believe there's a dinner at The Greenbrier. Does
4 -- does that ring any bells for you?

5 A Yeah. My understanding was, after the
6 Moorefield High School event, that they were going
7 to be going down there for a -- a late -- like,
8 early dinner, I think, perhaps, and then going to
9 Charleston that night. That was my recollection
10 of that day's sort of itinerary.

11 Q Okay. Do you know any -- anything about
12 the purpose for that -- that dinner?

13 A Boy, I probably did at the time. I'm
14 trying to recall exactly what -- you know, who it
15 was with and why, and I -- I -- I just don't
16 remember, to be honest.

17 MR. QUINN: We can -- there's one other
18 document I can show you, and I can let you kind of
19 look through it. It's -- and it might refresh
20 your recollection a little bit. Let's see. Carl,
21 if you can pull up tab 1 and mark that as Exhibit
22 B.

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

27

1 (Exhibit B was marked.)

2 THE WITNESS: And that's the wrong --

3 MR. QUINN: Yeah. I think we've got the
4 wrong document up, Carl.

5 THE WITNESS: Yeah.

6 MR. QUINN: Or we had it for a second.

7 THE WITNESS: Yeah, we did.

8 MR. QUINN: And then it was --

9 A That looks like it's a typical planning
10 document we use on trips and everything.

11 BY MR. QUINN:

12 Q Okay. I've seen them referred to as
13 LBLs. Is that -- does that mean --

14 A Line by lines.

15 Q -- line by lines?

16 A Yeah. Yeah, exactly.

17 Q Okay. So if you want to take -- this is
18 a couple -- or a two-page document. Carl, can you
19 give Current Staffer 2 control of the document? And then if you
20 want to take a minute or two just to look through
21 it. I'll say for the record, this is a -- as Current Staffer 2
22 said, a line by line, basically agenda or calendar

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

28

1 of events from August 2nd to August 5th, on the
2 second and third page, and at the bottom, it notes
3 that it was revised on 8/2/2021. And we -- Current Staffer 2,
4 just so that you see, at the bottom right, we
5 apply our own numbering system to documents --

6 A Sure. Sure.

7 Q -- so that we can identify them later.
8 So for the record, this document has a Bates Stamp
9 of WB_0210.

10 A All right.

11 Q Okay. Yeah. Current Staffer 2, if you want to take a
12 minute to look at that and then just let me know
13 when you're -- when you're done scanning it.

14 A Yeah. Yeah. I -- I think that's a fair
15 and accurate depiction of the trip. There may
16 have been, as I recall, maybe a last-minute
17 inclusion of some small group. It was -- it was
18 something Susie had put together. I'm trying to
19 think what the group would have been even --
20 that's not listed there. I -- I think it was sort
21 of a -- a last minute addition, either the evening
22 of the 3rd or the 4th, but other than that, it's

1 -- I think it's a pretty accurate description. I
2 -- the -- the -- as far as The Greenbrier dinner,
3 I don't know who the Lamptons are.

4 Q Okay.

5 A I have no idea who they are. No matter
6 --

7 Q Okay. Yeah, that's what I was --

8 A -- what (inaudible) occurred, quite
9 frankly. I'm assuming it did, but I don't even
10 know whether it actually did or not.

11 Q Okay. You said you're not sure if it
12 occurred?

13 A Right. I'm -- I'm not even sure if it
14 occurred.

15 Q Okay.

16 A I'm assuming it --

17 Q Sorry. It just cut out. Okay. What
18 I'll -- I'll ask a couple other just kind of
19 general questions. If you actually scroll back to
20 that first page.

21 A Yeah.

22 Q So it looks like -- I can see that

1 there's a column for who will be staffing
2 Representative Mooney at these events, and it
3 looks like you staffed him at the first event,
4 like you said, that Moorefield art show.

5 A Right. Right.

6 Q And then do you have any idea how
7 Representative Mooney got from Moorefield then to
8 The Greenbar -- brier later that afternoon?

9 A Yeah. They -- they had the family van.
10 Matter of fact, I -- when I -- I met him outside
11 of the high school. That's what they were -- they
12 drove up in that van from their home. They had
13 driven up then, and that was my understanding.
14 They'd be driving that -- to The Greenbrier and
15 then up to Charleston.

16 Q Okay. Okay. And then it looks like --
17 right. They went to Charleston that evening to
18 stay in a hotel, and then the next morning, for
19 the first event, which is a meet with Charleston
20 City police officers. [Current Staffer 1] is staffing
21 Representative Mooney. That's [Current Staffer 1]?

22 A That's correct, yes.

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

31

1 Q Okay. Okay.

2 A Yeah. My -- my understanding --

3 Q Okay.

4 A -- is [Current Staffer 1] pretty much staffed him the
5 whole time he was there. Once he got to
6 Charleston, he was with him most of the rest of
7 that trip, he and the fam -- he and -- and -- with
8 the congressman and his family.

9 Q Okay. All right. And then, if you look
10 at this page that we're on right now, at 11
11 o'clock on Wednesday the 4th, there's a tour of
12 Gritt's Farm in Buffalo, West Virginia.

13 A All right.

14 Q That -- now, by Wednesday, we are in
15 Representative Mooney's district; is that -- is
16 that correct? Buffalo, West Virginia?

17 A I -- I think it is. Again, even though
18 it says I was -- details from me, actually [Current Staffer 1]
19 took care of all that stuff, is my understanding.
20 Because, like I say --

21 Q Okay.

22 A -- my familiarity with that part of the

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

32

1 district is very minimal.

2 Q Okay. Got you. So you don't know
3 anything about -- or -- or do you know anything
4 about the tour of Gritt's Farm?

5 A No. I never -- I never even heard of
6 Gritt's Farm until -- until this event, so I -- I
7 really don't know much about it at all, to be
8 honest.

9 Q Okay. Okay. And then I'll ask first:
10 Specifically for this trip, do you know if -- once
11 they drove down to Charleston with the family car,
12 was -- is that the vehicle they used for the --
13 the rest of that weekend, or would -- would [Current Staffer 1]
14 have been driving them? Do you know how that --
15 that would have gone?

16 A I -- I don't know for certain. My -- my
17 impression was -- was that they were going to
18 drive separately and that [Current Staffer 1] would -- would
19 follow them, but again, I -- I just don't know if
20 that's what actually occurred or not.

21 Q Okay. Great. I think -- I think that's
22 probably all the questions that I have for you on

1 this document. So, Carl, you can -- you can pull
2 that down. And then, while we're talking about
3 driving in general, does -- well, when
4 Representative Mooney is -- is in the district or
5 -- or in the state, does he have somebody that
6 normally drives him? Does he have, like, a driver
7 or --

8 A Typically, when -- again, prior to the
9 end of last year, Rainer would often do -- Rainer
10 Kissel would often do a lot of the driving. Not
11 all the time. It was kind of hit and miss, but --
12 but Rainer would, on occasion, take him to
13 Washington, given the proximity of the residence
14 to the -- to the Capitol. So he would sometimes
15 do that. He would sometimes do things in the
16 district for the -- for the congressman. Sometime
17 make runs to airports, you know.

18 Rainer was sort of a do-all kind of guy,
19 you know, the type of guy I guess the congressman
20 likes to have around to -- to -- sort of
21 multifaceted in nature, so -- but then at the
22 other times, he would drive. I know on a -- on a

1 trip I made with him -- I guess it was earlier
2 this year.

3 We met on the way to -- to Moorefield,
4 and then off into Seneca Rocks in the -- in the
5 district there, too, where he drove because he was
6 going somewhere else after that and I was -- had
7 an intern with me, and so the -- the young guy who
8 was the intern was in my car and the congressman
9 was driving separately, so we make several stops.

10 But there are other times -- like
11 earlier this year, there was a Saturday event at
12 Jane Lew with the -- the Volunteer Fire
13 Department, and he had been in the district, and
14 this was kind of on the -- on the back end of the
15 -- of a trip where I drove to Jane Lew and then
16 drove he and a -- and a -- I want to say at least
17 a -- one staffer back to the -- back to the
18 eastern part of the state. So that would --

19 Q Okay.

20 A Say March, maybe. Something like that.

21 Q Okay. And then I just want to circle
22 back quickly. I know you talked about that --

1 that one campaign event where you had either
2 picked up or dropped off the congressman and --
3 and he reimbursed you --

4 A Yeah.

5 Q -- for that mileage personally. Do you
6 know if he did that with other staffers or if that
7 -- if that was common?

8 A My -- and, again, that time -- because
9 it was such an unusual event for me, but there had
10 been originally talk about being paid in gift
11 cards, and then a determination was made that that
12 was no longer an appropriate tool to use for such
13 reimbursements. And so that's where it came back
14 to him writing a -- a personal check to me for the
15 mileage that I accrued that day. That --

16 Q Okay.

17 A -- was my understanding of how that
18 worked, anyway.

19 Q Okay. And do you -- do you recall when
20 that kind of policy changed happen, when -- when
21 it was decided that gift cards shouldn't be used
22 to reimburse staffers?

1 A Again, if my memory is correct, that was
2 either, like, July or August of 2020. And so it
3 -- it probably would have been right around that
4 period of time because, again, when that was
5 initially talked about, you know, even after the
6 fact, as I recall, that I was going to get
7 reimbursed with -- with a gift card. And then
8 they decided, no, that was not appropriate. So,
9 again, at the end of the day, it kind of became a
10 personal check being the reimbursement. It was --
11 they say it was at the Nemacolin Resort there in
12 Southwestern Pennsylvania. I know it was --

13 Q Okay.

14 A -- it was -- it was an event for
15 Republican members that they had planned on this,
16 like, I guess, on a Friday evening.

17 Q Okay. Just on the point of -- of those
18 -- of those gift cards, had -- had you been ever
19 -- had you ever been reimbursed, prior to that
20 policy change, with a gift card?

21 A Not that I recall. No.

22 Q Okay. Do you know -- do you know of

1 anybody that was or do you recall any particular
2 instances of that happening?

3 A Specifically, no. It's just my
4 understanding was -- was that was kind of the --
5 the policy of the camp, was to use gift cards as a
6 -- as a tool for reimbursement when things could
7 not be written off as some sort of work-related
8 mileage. But as to -- it's specific individuals,
9 you know, Rainer comes to mind as a possibility.
10 Again, I don't even know there for sure whether he
11 was actually ever reimbursed in that way or not.
12 I just don't know.

13 Q Okay. I just want to make sure I
14 understood what you meant there. So you said the
15 gift card would be used -- and correct me if I'm
16 wrong. You said the gift card would be used to
17 reimburse somebody if it was determined that
18 mileage or something couldn't be written off as a
19 -- as a work expense?

20 A That's correct. Yeah. That was -- that
21 was before they changed --

22 Q Okay. Had you --

1 A -- what the policy was, yeah. I never
2 saw it written down --

3 Q And when you say --

4 A -- or anything like that, but --

5 Q Okay. And when you say work event --
6 sorry, work reason, do you mean like official
7 congressional work --

8 A Right.

9 Q -- as opposed to campaign -- as opposed
10 to --

11 A Exactly.

12 Q -- campaign work?

13 A Exactly.

14 Q Okay. Okay. And then just quickly, on
15 Rainer Kissel, you said that he -- he left -- can
16 you remind me when -- when he stopped working for
17 the -- for the member?

18 A My understanding was it was the end of
19 last year, so it would have been December of 2020.

20 Q Okay. And do you know why he left?

21 A Rainer's, I think, in his seventies, and
22 he had got his five years and so he was eligible

1 for a modest pension at that point, is my
2 understanding. And -- so, yeah. Yeah. He just
3 --

4 Q Okay.

5 A -- wanted to -- to -- and he -- I -- you
6 know, I think he still occasionally does some
7 things for the congressman, you know, just on a
8 personal basis. But he's not an official employee
9 anymore.

10 Q Okay. I think that's everything I have
11 for that early August trip. Let me just look
12 quickly and then I can move on. One thing I will
13 ask you, just about that trip generally: Do you
14 know -- were you involved in any of the payments
15 for either hotels or meals on that trip, or
16 seeking reimbursement for those?

17 A Yeah. The only thing that I was seeking
18 reimbursement for was for that lunch in
19 Moorefield. Matter of fact, again, it's on the --
20 the -- the -- my recently submitted expense
21 report, where I paid for both mine and the
22 congressman's lunch.

1 Q Okay. And that was -- that was a
2 submission to get reimbursement from the MRA?

3 A Yeah. My -- as an official function.

4 Q Not --

5 A Yeah. Yeah. It's typical --

6 Q Official. Yup. Yup.

7 A -- reimbursement process for that trip.

8 I --

9 Q Yeah. I just mean I'm -- sorry. Go
10 ahead.

11 A No. I just -- on that particular visit
12 I -- I claim mileage and that lunch.

13 Q Okay. Yeah. I just meant -- I wasn't
14 being clear. I just meant it was an official
15 reimbursement as opposed to a campaign
16 reimbursement?

17 A Correct. Right. That's my -- that's
18 what I understood that to be what you were asking,
19 yes.

20 Q Okay. And then, lastly, on that trip,
21 are you -- are you aware of any communications
22 with or discussions about addressing the trip with

1 the ethics committee?

2 A I'm not following what you're asking, to
3 be honest, Sean.

4 Q I -- I'll give you a little -- I'll give
5 you a little background. There was -- shortly
6 after that trip -- I'm sure you get these updates
7 from the ethics committee about certain issues
8 that they want to address or -- or raise for
9 members and staff. Sometimes they're referred to
10 as pink sheets. And there was an e-mail sent out
11 by the ethics committee shortly after -- it was a
12 few weeks after this trip, that clarified rules
13 about members making official visits to other
14 districts, to other members districts. In
15 particularly it was focusing on this idea of
16 redistricting happening and --

17 A Right.

18 Q -- visiting districts that may become
19 part of your district. Does that ring any bells?
20 Were there any conversations about -- about that
21 ethics guidance or conversations --

22 A With the congressman?

1 Q -- with the ethics committee --

2 A With the congressman?

3 Q -- or -- or with anybody in the office.

4 A The -- the only thing that we've talked
5 -- and this really wasn't so much related to that
6 trip it's just the idea that, like, I attended,
7 like, a public hearing on redistricting in Keyser,
8 which is technically outside of the district, but
9 very close to the district, and it was a regional
10 meeting and so it was like sort of a justified
11 thing.

12 But that -- the person that manages so
13 -- sort of the fiscal affairs, [Current Staffer 3], was
14 expressing concern that staff be aware that
15 out-of-district travel is being scrutinized very
16 closely and -- and you need to be aware of those
17 things, and -- and, you know, just, you know, be
18 -- be mindful of those things. And that is -- you
19 know, unless there's a really good reason to do
20 it, it probably should be avoided. That was kind
21 of a lot, but, yeah --

22 Q Okay.

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

43

1 A -- the specific things from -- from the
2 ethics committee, no. I -- I -- I really don't
3 know much about that.

4 Q Okay. Do you remember when that
5 conversation with [Current Staffer 3] was?

6 A I didn't actually talk to [Current Staffer 3] about it,
7 but this was through Jean. Jean had talked to him
8 about it and she -- she had mentioned it to me
9 several times, you know, between, you know, August
10 and September. You know, that's been kind of a
11 theme for -- for her and the staff to -- to, you
12 know, just be cognizant of those things, and --
13 and to -- to have good rationale for -- for visits
14 like that.

15 Q Okay. Got you. Yeah. It sounds like
16 that timing probably matches up with the ethics
17 committee notice so that's --

18 A Yeah.

19 Q -- that makes sense. So that's --

20 A I'm sure that's where [Current Staffer 3] was probably
21 getting that from and recognizing his, you know,
22 sort of cautious red flag, if you will, to those

1 types of visits and everything. Right.

2 Q Right. Right. Okay. Great. Then I
3 think we're done talking about that trip. I have
4 sort of a -- I don't want to call it a laundry
5 list because it's not particularly long, but a
6 couple different items that we can hit --

7 A Sure.

8 Q -- that I'll ask you about and you may
9 know nothing about them, and that's fine, you can
10 just let me know. But if something rings a bell
11 just -- just let me know and we'll kind of stop
12 and -- and talk about it a little bit more. The
13 first thing I want to ask you about, there was a
14 -- I believe, a trip in March of this year to
15 Aruba that the member took with his family. Are
16 you familiar with that trip or do you know
17 anything about it?

18 A Not really. No. I -- I may have heard
19 it in conversation that they were taking a
20 vacation, and I don't even recall much of that.
21 So, yeah, very gray, my background on trips to
22 Aruba.

1 Q Okay. And then I -- I know you started
2 in February of 2019 so you probably won't be
3 familiar with this, but there was a celebration in
4 2018 of the congressman's birthday that happened
5 on Capitol grounds, on the speaker's balcony. Do
6 you know -- do know anything about that birthday
7 celebration --

8 A No. No. Uh-uh.

9 Q -- or ever had any conversations with
10 anybody?

11 A No.

12 Q Okay. Then we'll move on from that,
13 too. I think you probably will be a little
14 familiar with -- so our -- I think you know our
15 office conducts reviews of members spending and
16 conduct, and there was a previous review of -- of
17 some of Representative Mooney's spending and
18 conduct. And then we are now conducting this --
19 this second unrelated review. So I wanted to ask
20 you about the -- the first one --

21 A Sure.

22 Q -- that happened earlier this year.

1 Were -- were you aware of that review as that was
2 ongoing?

3 A I mean, you know, once it -- well, I
4 forget whether it was roll -- I think it was roll
5 call. One of the -- you know, it became public,
6 but, you know, in -- in conversations with [Former Staffer 1],
7 he had mentioned and -- that there was a review
8 going on and everything. This goes back, you
9 know, late winter, spring at the very -- at the
10 very latest, you know, I was aware of it.

11 Probably a little prior to that even,
12 that there was some conversations taking place
13 probably maybe even in the late last year perhaps.
14 I'm not exactly sure when I first became aware of
15 it, but, yeah, it was probably through [Former Staffer 1].

16 Q Okay. And -- and what had -- what had
17 [Former Staffer 1] told you about what was going on as far as
18 you remember?

19 A Yeah. My -- my discussions with him and
20 -- they were strictly about, like, the trip. I
21 want to say it was in May of '20, where I set up
22 meetings for both Michael Hough and the

1 congressman. Although my -- most of my meeting
2 set-ups were for Michael as opposed to the
3 congressman. I think Rainer took care of the
4 congressman's arrangements, as I recall. But I
5 set up a couple of stops for Michael to make that
6 were nearby where they were staying. I was a part
7 of that.

8 Q Okay. And what was -- can you just go
9 into a little detail about which trip that was,
10 when it was, and -- and where they were going?

11 A That would've been the one to -- to the
12 Smoke Hole Resort.

13 Q Okay. Was this a staff -- an all-staff
14 meeting?

15 A No. No. No. This was just -- my
16 understanding was -- was that they were going to
17 the congressman and Michael and -- and perhaps
18 family were going to be there for the weekend and
19 -- or a day or two. I'm not sure what -- what the
20 specifics of the itinerary were, but that -- you
21 know, we were setting up meetings to go along with
22 that visit as well.

1 Q Okay. And remind me of the time frame
2 of that trip again.

3 A I'm thinking it was May of -- of '20.
4 It sounds right. I could -- I could certainly
5 find out and look that up if need be. That was
6 one of the -- the items, as I recall, with the
7 initial investigation. That was one of the things
8 that was talked about.

9 Q Okay. I think that I can follow up with
10 you --

11 A Sure.

12 Q -- if we need to, but I think -- I think
13 May 2020 serves our purposes for right now. Okay.
14 And then you -- so you said that that trip was
15 planned and you were setting up some meetings
16 related to that trip.

17 A Correct.

18 Q Do you -- do you recall what me -- do
19 you recall what -- what those meetings were, who
20 they were with?

21 A Yeah. Yeah. The one meeting was with
22 the Hampshire County Economic Development

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

49

1 Authority director, her name is Eileen Johnson --
2 Ms. Eileen Johnson, and she's out of Romney, West
3 Virginia. And then the second meeting, and the --
4 again, these are both for Michael. The second
5 meeting that I set up was with Commissioner Gene
6 McConnell from Pendleton County, West Virginia.

7 Q Okay. And then back to -- kind of back
8 to our -- our review. You said that you had
9 talked to [Former Staffer 1] about that kind of in the context
10 of he was collecting information about that trip
11 because the OCE had asked about it?

12 A Yes. Yeah. Yeah. He asked me to go
13 back through my records to look at e-mails that
14 I'd had, like, with the scheduler, [Former Staffer 2]
15 or -- or Michael, or anybody else in that time
16 frame to -- to kind of corral those, if you will,
17 and forward those back to him. So that he would
18 have those as part of what he was putting together
19 for you-all is --

20 Q Okay.

21 A -- is my understanding. Yeah.

22 Q Right. Yeah. That sounds about right.

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

50

1 We worked closely with [Former Staffer 1] on that so -- I'm sure
2 that was a thankless task for him, collecting all
3 those documents. So --

4 A I know he put a lot of time into the --
5 the -- the whole putting things together. Yeah.
6 I don't know -- it's like I said, I know he was
7 very busy in that stretch doing things.

8 Q Were there any other particular trips or
9 items that -- that my office was inquiring about
10 that you are involved in as far as collecting
11 documents or providing information?

12 A No. My only -- and, again, this is just
13 my personal sort of observation. It seemed like
14 there may have been some confusion with some of
15 those visits and some of the all-staff --
16 retreat that we had. I know -- I believe it was
17 in October of -- of '19 that we had a staff
18 retreat at Smoke Hole Ranch, that was indeed an
19 all-staff retreat. And then I want to say --
20 trying to think when last year's was, it may have
21 been October, a few days before the election. I
22 know that -- in Canaan Valley Resort, and -- and

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

51

1 that was an all-staff meeting as well.

2 So at least in the reporting that I saw
3 on -- in the publications it looked like there may
4 have been some confusion as to, you know, what was
5 what, you know. Because I know there was a visit
6 that the Congressman made the Canaan Valley in
7 December of one year and that was different than
8 that. Then there was also that Smoke Hole Ranch
9 event that -- that he and Michael went to. Their
10 visit was, I believe, in like I say, in May of
11 '20, and -- and we also use that resort as an
12 all-staff retreat in the fall of '19, I believe.

13 Q Right. Right. So -- great. So
14 multiple -- multiple stops at the same --

15 A Yeah. Yeah.

16 Q -- at the same spot? Okay. Any other
17 -- so -- any other conversations with [Former Staffer 1] or
18 anybody else in the office that -- that you can
19 recall about kind of collecting information or
20 documents that reflect --

21 A [Former Staffer 1] would've been in conduit for that
22 information. And so I was relayed to kind of my

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

52

1 primary funnel, if you will, for any information
2 that would be forward through [Former Staffer 1]. Michael may
3 have asked me indirectly a time or two, but I
4 don't even recall that specifically, to be honest.

5 Q Okay. Yeah. I was actually just going
6 to run through a couple of names real quick and --

7 A Yeah.

8 Q -- and you can tell me if you recall any
9 specific conversations.

10 A Sure.

11 Q So how about -- how about with [Former
12 Staffer 2]? I know that she was somewhat involved
13 in that process as well.

14 A Yes.

15 Q Did you have any conversation with her?

16 A No. I would -- no. I just coordinate
17 with [Former Staffer 2] primarily through e-mail. We would
18 have a phone call on occasion, just, you know,
19 making sure that she got the information that I
20 was providing or, you know, that, hey, I just got
21 some e-mails from you, got us to chat about this
22 because as a scheduler of course, she was taking

1 care of all that stuff and everything. So, yeah.

2 Q Okay. And then how about [Former Staffer 3]?

3 Any conversations --

4 A Yes.

5 Q -- with her about -- about that process?

6 A Just indirect type of things, just an
7 investigation was underway. Of course, she was
8 handling some of the -- she was as -- my
9 understanding is [Former Staffer 3] was both staff and
10 campaign and that she was handling a lot of the
11 expenses of the campaign and trying to keep track
12 of that and it was kind of -- kind of jumbled up a
13 little bit. [Former Staffer 3] was a young lady, kind of
14 really had no -- didn't have a lot of experience
15 doing that kind of thing. And so there was, you
16 know, I guess some issues or problems with that,
17 but I -- I wasn't aware of the specific so much.

18 I know she was nervous. If you will,
19 just trying to handle all those things and
20 everything. She -- she popped into the office
21 here on occasion when -- because she would work
22 over at the congressman's house on occasion, too,

1 and -- and that type of thing in the campaign role
2 that she played. She'd -- she'd, you know, like I
3 said be (inaudible) times on occasion in her role
4 as a -- as a staffer as well, but not a whole lot.

5 Q Okay. And then how about with Michael
6 Hough? Any particular conversations about the
7 review or -- or collecting documents?

8 A Nothing in -- nothing in specific
9 system. He and I that I can recall. I mean, Mike
10 would -- would send out sort of the notifications
11 to, you know, save all the documents, save all the
12 e-mails, you know, be honest, straightforward, be
13 cooperative, you know, just sort of a general sort
14 of, you know, making staff aware and that you may
15 be contacted. And if you are, you know, please
16 follow through accordingly, you know, on a
17 professional, honest, ethical way, you know, that
18 type of thing.

19 Q Okay. And then lastly, Representative
20 Mooney. Any -- any conversations with him about
21 the review or -- or the response to the review?

22 A No. Nothing that I can recall of any

1 specific nature.

2 Q Okay. Okay. And then just kind of
3 moving on down that laundry list. One of the
4 things I want to talk about is the -- is the use
5 of staff for what potentially could be personal
6 errands. If you either ever -- ever seen that or
7 had any concerns about that. We can start kind of
8 generally and -- and then I'll -- I'll ask you
9 some more specific questions, but I guess a direct
10 question being -- have -- have you ever had any
11 concerns about staff being used for personal
12 errands?

13 A Yeah. I mean, there were some sort of
14 times where people would be like, you know,
15 running one of their kids to class. Heard
16 rumblings that, you know, previous staff members
17 had sort of babysit the younger child before that
18 type of thing, you know, I've heard rumblings
19 about Ranier doing things for the family, you
20 know, car repairs, that type of thing. So -- and
21 in all honesty, yeah, you know, I definitely had
22 heard sort of, kind of I'm blurring other lines,

1 if you will.

2 Q Okay. We can run through some of those
3 specifics. Let's -- let's take those couple of
4 examples that you gave me just kind of one-by-one
5 quickly. So first you said running -- running
6 kids to class?

7 A Yeah. I know the oldest son took some
8 classes at Blue Ridge here in Martinsburg, the
9 -- the community college or the technical and
10 community College here. And my understanding was
11 is that there had been times where perhaps
12 somebody gone to pick one of the kids, you know,
13 pick him up that type of thing. I don't think it
14 was a normal part of the -- of the schedule, but
15 just on occasion when there was need, I think Mrs.
16 Mooney probably did a lot of that. Again, I'm
17 speculating on that -- that type of thing.

18 Q When you say Mrs. Mooney did -- did a
19 lot of that, you mean made those requests?

20 A No. No. It was just -- would happen on
21 a -- and I don't even know who would make the
22 request quite frankly. I know one time I was with

1 the -- literally the -- the community college is
2 like a half-mile off Interstate 81 and sign out
3 one time I was driving somewhere. It's been a
4 long time ago, probably back '18 and like, Oh, can
5 we drop my son off at school?

6 You know, and like I said, it was a
7 very, very minor blip off what the normal route
8 would have been. Certainly seemed very reasonable
9 thing to do at the time. Now, like I said for
10 other things where, you know staff had babysat or
11 picked up one of the kids somewhere, that type of
12 thing.

13 Q I think maybe I misunderstood what you
14 had said earlier. Did you mean if that normally
15 was Mrs. Mooney that would pick up the --

16 A Yeah. That was my understanding that
17 she would probably be the one who was doing that
18 or even -- even (inaudible) Lala possibly. I --
19 I'm not sure specifics like it probably varied
20 from day to day and time to time.

21 Q Do you remember who told you that they
22 had picked up the older son from Community

1 College? Do you know who might have done that.

2 A Maybe Rainer, you know, it's possible.

3 Q And then you mentioned babysitting
4 sometimes. Do you recall any specific incidents
5 or any -- any specifics staffers that might have
6 done that?

7 A Yeah. This -- this goes back to when
8 Hannah, I think, Mansell -- Hannah Mansell if
9 you heard that name, that she was part staff, part
10 campaign and I heard from others, you know, that
11 sometimes she would take care of the kids, watch
12 the kids on occasion while she was working in the
13 house on the campaign staff. But, again, I --
14 that was second, third-hand information. So
15 wasn't anything I can specifically attest to. You
16 know, actually. Did it occur when it occurred or
17 anything like that?

18 Q Okay. And then quickly this on -- on
19 those first two running kids to classes or baby
20 sitting. Do you know -- did those happen sort of
21 during traditional work hours like, you know, 9:00
22 to 5:00 or 9:00 to 6:00?

1 A I'm -- I'm sure they did. I'm sure they
2 did. Yeah.

3 Q You also mentioned Rainer doing car
4 repairs. Can you go into a little more detail
5 about that?

6 A This is the idea that I know the -- the
7 Mooney's had older vehicles typically, and Rainer
8 would on occasion make sure they were operational,
9 I guess if you trying to make because he's -- he's
10 -- he's very skilled in that regard. And so he
11 was -- I think he was pretty helpful to the
12 Mooney's as far as the maintenance of their
13 vehicles, helping them was in that regard. Not --
14 not -- not solely him, of course, but -- but just
15 would -- would take care of some things when they
16 needed to be done if they were minor nature, that
17 type of thing.

18 Q Okay. And -- and just to make sure I
19 understand, you don't mean that he would take the
20 car into like a car repair shop. You mean he
21 would -- he would actually do the repairs on the
22 car?

1 A Probably both, I'm guessing.

2 Q Okay.

3 A Sometimes it would be to a repair shop,
4 sometimes he would do work himself. That's my
5 understanding.

6 Q Okay. I have some kind of examples we
7 could go through or -- or not actual examples,
8 just kind of hypothetical situations. But is
9 there anything before we go through that kind of
10 list? Anything else off the top of your head that
11 -- that you can think of that falls into that
12 category of things that seemed like they might
13 have been personal errands?

14 A You know, I -- I -- I can't -- I can't
15 really think of anything. At one time I did a
16 little work for the daughter. She was doing a
17 saying what the daughter was calling a read
18 program for -- for -- for children and it was a
19 nice school project. And I got a couple of
20 contexts for her, you know, but it wasn't anything
21 very time-consuming or anything else, but, no.
22 Other than that, not really, you know.

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

61

1 Q Just taking that maybe that example of a
2 -- that situation. Just having an example. Do
3 you recall who -- who originally asked you to help
4 her with that project?

5 A I think they communicated through [Former Staffer 1]
6 to me and then I exchanged a couple of e-mails
7 with the daughter.

8 Q Okay.

9 A Yeah.

10 Q And then like I said, we can go through
11 a couple sort of hypothetical or sort of typical
12 instances and -- and you can tell me if they ring
13 a bell, or if you think of any new --

14 A Okay.

15 Q So maybe we can talk about the tasks for
16 particular family members. Do you remember
17 anything that you did for -- let's take Grace
18 Mooney first?

19 A No. No. I've never done anything for
20 Grace.

21 Q No? Okay. Or how about I think you've
22 mentioned represented Mooney's mother, Lala?

1 A Yeah. No.

2 Q Any recall --

3 A No. I mean, you know, I consider Lala a
4 friend and we communicate on personal e-mails and
5 stuff, but have not really done anything on office
6 time that would sort of go beyond, you know, what
7 would normally take place. You know, like I said,
8 I consider her a friend and somebody that
9 obviously cares a lot of about her son. She's
10 probably -- she's -- she's probably his most
11 ardent supporter and she gets out and about and
12 visits a lot of folks and everything. As -- as,
13 you know, for an 80-year-old woman, she's the
14 sweetest lady. So, yeah.

15 Q Okay. Any more sort of driving related
16 tasks that you can think of or specific incidents
17 where -- where you think the -- the trip was for a
18 personal purpose as opposed to official or
19 campaign?

20 A Nothing that involved me. The -- the
21 only time, quite frankly I can recall that I did
22 anything on a personal basis that Jane road trip

1 earlier this year where it was a Saturday and
2 congressman, after that trip, instead of going
3 home, went to her home in Virginia, sort of, I
4 guess it'd be east of the Winchester area to visit
5 a friend that they were having a little get
6 together with folks for UFC or one of them, I
7 don't know.

8 Probably UFC type fight thing and you
9 know, I claim mileage. I forget whether it was to
10 the district office to my house, but I didn't
11 claim anything beyond that. Just sort of aid
12 those costs because I knew they were legitimate
13 cost to make beyond what I should claim. So --

14 Q Okay. Right.

15 A Yeah.

16 Q Do -- do you recall about how long that
17 -- that detour to that friend's house was?

18 A For me, is probably a round trip of 60
19 maybe 70 miles from, you know --

20 Q In addition -- in addition --

21 A -- in addition to what I would have
22 claimed. I -- I don't know the exact figure --

1 the exact number, but it was probably something
2 close to that. And that -- and that would be the
3 -- the grand total. So 30, 35 miles each
4 direction.

5 Q Great. And then just thinking about
6 that as an example. How -- how was that request
7 made to you or -- or described to you?

8 A Yeah. I mean, we were -- we were -- we
9 were driving headed back. He said, Oh, by the
10 way, could you run me over to this friend's house?
11 We're going over there and then my understanding
12 was the son was already there and they were going
13 to drive back in their personal vehicle, you know,
14 that type of thing. So --

15 Q Did -- was there any recognition from
16 Representative Mooney that this was a personal
17 favor or a personal trip as opposed to work or did
18 it come as kind of just a standard type of work
19 request that he would make? Can you drive me --

20 A It was Saturday and it was Saturday
21 evening and it was getting late and they -- they
22 -- they, I guess had that planned and so because

1 we were getting probably back later than
2 anticipated perhaps, I'm not even sure about that.
3 Can I run them over there? Would that be okay?
4 And I said sure.

5 Q Okay.

6 A You know, and it was not asked that I
7 not report it or anything. I just took it upon
8 myself to say look, that's not something I can
9 claim officially. So I didn't.

10 Q Great. For -- in any discussion that
11 you -- that you have with anybody else, either
12 Rainer or discussions about like Hannah looking
13 after the kids. Did you get an impression from
14 those individuals about -- about how they received
15 those requests? Did they understand them as
16 personal errands that they could turn down or did
17 -- or was this just seen as sort of, you know,
18 understood that this was part of your -- your job
19 as far as -- yeah. Was it -- was it understood
20 that that was, you know, standard or -- or a
21 normal part of their job?

22 A I -- I know that such requests probably

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

66

1 -- well, not on a regular basis, were not
2 infrequent either. I never had a conversation
3 with Hannah about those things like I said.
4 Rainer I would talk to on occasion and, you know,
5 just I think he, [Former Staffer 1], [Former Staffer 2], others kind of
6 would express concern that, you know, some of
7 these things were certainly not appropriate, if
8 you will, and sort of go beyond what should be
9 asked of a staff person. I can say I don't --

10 Q Did --

11 A -- regular, but I -- but on the other
12 hand, I -- they -- they did occur on -- on number
13 of occasions.

14 Q Okay. Did -- did you ever get an
15 impression from them or have a conversation about
16 whether or not they felt comfortable saying no to
17 the congressman?

18 A No. I -- I mean, I -- [Former Staffer 2] probably
19 would be uncomfortable saying no, I would think.
20 That was my impression. I don't think [Former Staffer 1] would
21 be uncomfortable saying no, you now, Rainer,
22 because you'd have to understand who Rainer is and

1 -- and he's really kind of a very strong supporter
2 of the congressman, felt like it was -- you know,
3 I mean, he -- he would sometimes express concern.

4 But the other hand, he would also
5 willingly do it. It wasn't like -- so I don't
6 know whether he felt uncomfortable saying no or
7 not, but it seemed like he was willingly wanting
8 to do things, just be helpful and supportive over
9 the time that he was with the congressman.

10 Q Okay. Understood. Did you ever hear
11 about any tasks related to dry cleaning or -- or
12 laundry -- the personal attire?

13 A I mean, vaguely I may recall like
14 fearing like maybe Hannah pickup the laundry or
15 something like that. I -- I have no direct
16 knowledge of that occurring. Just sort of
17 indirect conversations that, you know, hadn't
18 occurred and that would have been a very -- I may
19 have heard that once or twice, you know, during my
20 tenure here. Nothing recently in that regard,
21 but, yeah, I -- I can't say that I've never heard
22 it.

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

68

1 Q Okay. And then, just generally, you
2 know, you know, I know Rainer retired, and I -- I
3 don't think Hannah spoke to the congressman
4 anymore --

5 A No. She had been throw --

6 Q -- so there is -- you know. Okay. In
7 hearing about turnover in the office or -- or
8 people leaving, did you ever get the impression
9 that anybody left or that part of the reason for
10 their departure was because they wouldn't do these
11 sorts of tasks for the congressman?

12 A The only person that I -- that I got the
13 impression left that was encouraged to leave, let
14 me put it that way, maybe would be [Former Staffer 3], just
15 because she was not doing the best of work on
16 tracking the finances and -- and -- and so forth.
17 Then off course recently there was [Former Staffer 6] who was
18 dismissed for -- I would kind of call it
19 insubordination.

20 Q Okay. Yeah, we can come -- one of the
21 laundry list items is -- is [Former Staffer 6] so we can -- we
22 can come back to that in a second. So you said

1 you -- your impression about [Former Staffer 3] departure
2 was -- was more related to the quality of her work
3 and less to do with --

4 A Well, I mean --

5 Q -- agreeing to or not agreeing --

6 A -- she left to get another job. I'm
7 sorry. I'm -- I'm talking over you. I apologize.

8 Q No.

9 A She left to --

10 Q Go ahead.

11 A -- get another job on the Hill. I
12 believe it was Congressman Livingston's office in
13 Louisiana is my recollection. It's like I said, I
14 don't think she was fired. I do know there was
15 displeasure with some of her work performance.

16 Q Okay.

17 A So it -- it may have been sort of a
18 mutually -- a mutual thing, if you will.

19 Q Okay. But did -- did you -- I had
20 originally asked the question, you know, did
21 anybody depart basically because they wouldn't do
22 those sorts of personal errands. And -- and you

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

70

1 mentioned [Former Staffer 3] but it sounds like maybe her
2 departure had more to do with the quality of her
3 work --

4 A Yeah -- yeah --

5 Q -- or was it also --

6 A -- that -- that --

7 Q -- or what -- okay.

8 A No. I -- I don't know of anything
9 specific in that regard for anybody that they were
10 asked to do something and they didn't do it, and
11 therefore were -- were kind of forced out. I
12 don't have any recollection of anything like that.
13 The only --

14 Q Okay.

15 A -- staff turnover evident, you know,
16 within the last three to six months, you know,
17 there's been a -- a -- a number of folks leaving.
18 Anything I would say about their departures would
19 be speculative. I know [Former Staffer 1] situation and he's
20 got a -- he got a great job at [REDACTED] and I
21 told him, I -- I thought it was, like, his perfect
22 job. So I -- I think that was a natural thing for

1 him. I know he had been kind of looking to leave
2 at some point and COVID kind of reduced those
3 opportunities, if you will.

4 But this seemed like a natural move for
5 him to make. You know, [Former Staffer 2] departure,
6 Lynn's departure, Garrett's departure, I mean,
7 again, they were all going to other folks. So I
8 think there was probably, even in [Former Staffer 1] case,
9 concern about sort of the investigations, and
10 where that was leading, and everything, and that
11 -- that may have played a role in their decisions.
12 I -- I can't speak to what their actual rationale
13 was or not in regard to the ethics issues with the
14 congressman.

15 Q Okay. Understood. Let's -- and then
16 just quickly just to make sure I understood the
17 full story on [Former Staffer 1]. Other than -- than the [REDACTED]
18 [REDACTED], was there -- was there anything else
19 kind of leading to his departure, any -- any
20 concerns of either his work or -- or his
21 willingness to do sorts of -- the sort of personal
22 errands that we talked about?

1 A Yeah. I'll tell you [Former Staffer 1] was held in
2 very high regard by, I think, both Michael and the
3 congressman for the -- the thoroughness and
4 professionalism of his work. And I can attest to
5 that myself that -- that [Former Staffer 1] was a -- was a great
6 district director. And the -- the only thing I
7 can say to -- to -- to [Former Staffer 1] and the -- and the
8 congressman was that there would -- there would be
9 some frustration, you know, primarily him not
10 getting out and -- and being out and about as much
11 as, you know, he would like.

12 I think there was -- I think probably
13 there was a general consensus amongst most staff
14 that they wish he was out in the field more,
15 meeting with constituents, talking to folks,
16 having events, you know. I know in my life I've
17 been around number of political folks,
18 congressman, even senators, and it feels like
19 they're a little more active than Congressman
20 Mooney.

21 Q Okay. All right. So then -- then,
22 generally, he departed on pretty -- on good terms,

1 I guess?

2 A Oh, yeah. Yeah. Without a doubt. I
3 mean, I think they -- both the congressman and
4 Michael would -- would say they really hated to
5 see him go just because he was so professional and
6 so dependable.

7 MR. QUINN: Okay. Great. We've been
8 going for about an hour and 20 minutes. I hope
9 we'll wrap-up relatively soon, probably in the
10 next 20 minutes or so. But do you need to take a
11 break either for water, or bathroom, or anything?

12 THE WITNESS: I got a couple of water
13 here. I'm great. I'm fine. If you need to do
14 so, I'm good, too. So whatever you need to do,
15 Sean.

16 MR. QUINN: Why don't -- why don't we
17 take a quick five-minute break off --

18 THE WITNESS: Okay.

19 MR. QUINN: -- the record. I'm just
20 going to look back at my notes and make sure we've
21 covered most things and then I'll try to tighten
22 everything up so that we can get out of here --

1 THE WITNESS: Sounds good.

2 MR. QUINN: -- quickly.

3 THE WITNESS: All right.

4 MR. QUINN: Okay. So -- so then Kevin,
5 we can go off the record and then I'm just going
6 to mute my video and audio for a few minutes and
7 why don't we -- I'll turn everything back on in
8 about five minutes.

9 THE WITNESS: Sounds good.

10 MR. QUINN: Okay. Okay. Great.

11 THE REPORTER: Off record --

12 MR. QUINN: Thanks, Current Staffer 2.

13 THE REPORTER: -- 11:19 a.m.

14 (Whereupon, a recess was taken.)

15 THE REPORTER: Back on the record.

16 11:24 a.m.

17 BY MR. QUINN:

18 Q Okay. The only thing -- I just reviewed
19 my notes almost making sure I'd covered
20 everything. The -- the one thing I did want to
21 ask you about a little more quickly, the issue of
22 the gift card being used as a reimbursement

1 method. I know you said that policy sort of
2 changed -- changed at one point. Can you remind
3 me when you think that -- that happened?

4 A Yeah. Again, it -- it was at July or
5 August of 2020.

6 Q Okay. Go.

7 A So that -- remember that visit was to
8 Nemacolin. The original conversation primarily
9 with [Former Staffer 3] was that I'd be reimbursed with a gift
10 card. And then --

11 Q Right.

12 A -- that later -- and it sort of in
13 process of getting that turned around. Said, Oh,
14 we -- we shouldn't do that. So we're going to
15 just -- he ended up giving me a personal check for
16 it.

17 Q Okay. And then do you recall -- do you
18 know how that -- how that policy change happened,
19 or who recommended it, or who identified it as an
20 issue?

21 A No. [Former Staffer 3] didn't really go into much
22 detail about it. So I don't recall much of the --

1 the logic. I -- I -- Mike -- Michael may have
2 said something in passing about the -- the -- the
3 reasons why, but I don't even recall what those
4 were to be honest. It was kind of confusing to me
5 anyway as to why they originally thought it was,
6 you know, sort of a proper reimbursement tool and
7 -- and then what it's not.

8 Q And then do you recall any other uses
9 for those gift cards or -- or did you see any
10 other use for those gift cards?

11 A No. Aside from what I saw in the -- in
12 the report that came out, you know, that they were
13 used on a -- I guess, on a variety of ways and I'm
14 -- I'm not even sure specifically how they were
15 used beyond, you know, like for campaign related
16 expenses and that type of thing. But yeah.

17 Q Okay. Okay. Great. Then let's move on
18 to talking quickly about [Former Staffer 6]. I know you
19 mentioned you were aware some of the circumstances
20 of his departure.

21 A Right.

22 Q And can you just -- can you just tell me

1 about that generally?

2 A My impression about what happened there
3 was that he was in a conversation with a gentleman
4 who I had also talked to before too and actually
5 had meetings with Chuck de Caro. And original
6 meetings were to you'd like to meet with a
7 congressman and he had some concerns about
8 international relations affairs. He had a
9 background that, you know, he was a CNN reporter a
10 while back. He had done instruction at military
11 for military officers in the past. He had been a
12 special ops guy himself back when he was much
13 younger.

14 So, you know, certainly I took a meeting
15 with the guy and I recommended actually that the
16 -- the congressman meet with him. They didn't
17 want to. I guess that was an irritant to Chuck.
18 And he told me as much and began writing some
19 series of articles in the American Greatness, I
20 guess it's a podcast or something or it's actually
21 on the web, too, written articles that were pretty
22 scathing of the congressman and Michael in

1 particular. Congressman (inaudible) with him as
2 well. And you know, they -- his wife is the
3 former Headline News anchor for CNN.

4 And so they live in Harpers Ferry, so
5 they're constituents as well. And I told folks,
6 you know, I don't agree with -- I don't think I
7 told this to Michael or the congressman, but I
8 think I basically felt like, you know, Chuck was
9 kind by of an East Coast kind of guy and kind of
10 had the same mentality that, like, a President
11 Trump would have, that if -- if he wouldn't, you
12 know, if -- if you diss me, I was going to diss
13 you harder kind of thing. And so I think that was
14 kind of the -- the logic of Chuck's motivation in
15 doing some of those articles.

16 I think from what I understand, [Former Staffer 6]
17 was sort of a mole for him in the office. Chuck
18 never told me that. He never gave me a name. But
19 as putting -- connecting the dots, it appears to
20 [Former Staffer 6] was that individual. And from what my
21 understanding with the investigation they did,
22 they found out that he had had correspondence with

1 and conversations with Chuck and was divulging
2 internal matters that were -- were very
3 unprofessional in nature and led to his dismissal.

4 Q Okay. And so you said -- you said that
5 you had had some initial meetings with Mr. de Caro
6 --

7 A And even conversations --

8 Q -- when --

9 A -- after the fact, too. Even after some
10 of the articles had been written he had called me
11 a couple of times, and I'd even met with him a
12 couple of times because I was still trying to
13 encourage them to meet with him. And again, that
14 was, yeah. They just thought he was this crazy
15 guy, and a mean guy, and they didn't want anything
16 to do with him. Everything. And my final
17 conversation with him was probably maybe two
18 months ago.

19 And I said, pretty much, Chuck, you
20 know, I understand your frustration. I wish
21 they'd meet with you, too, but they're not. And,
22 you know, you know, you're doing a lot of harm to

1 the -- the most conservative guy in the state as
2 far as members of Congress, and is that what you
3 really want? Because Chuck always portrayed
4 himself as very a conservative guy. And so --
5 excuse me, I got a --

6 MR. QUINN: Hope no complaints if you
7 need to take a break.

8 A You know -- you know, look at where
9 you're headed with this and is this what you're
10 really want to do just because he won't meet with
11 you? And so I don't know how much influence, if
12 any, that had with Chuck, but I've -- there have
13 not been any articles since then.

14 So like I say, I was trying to kind of
15 look out for the congressman's mom in the process
16 and just kind of have conversations with her about
17 her meetings with Chuck. And, again, those were
18 all sort of not -- not on any official capacity,
19 but just sort of off the record stuff that I and
20 her and I had private conversations about with
21 Chuck -- about Chuck, if you will, and I was just
22 kind of looking out for her, too, but -- and that

1 was the nature of things.

2 Q So was -- was Chuck in conversation with
3 Lala also?

4 A They actually he met with -- Lola met
5 with Chuck and his wife for a lunch one Saturday,
6 awhile back, I would say probably April, maybe.
7 Something like that.

8 Q April of 2021?

9 A Yeah -- yeah. It was this year. It was
10 April or May, something like that.

11 Q I think we'll return to the kind of
12 specific interactions with -- with Chuck. But I
13 wanted to ask more generally about policies around
14 interacting with the press or how staff interact
15 with the press. Is -- is that part of -- do you
16 consider that part of your duties --

17 A No. As a matter of fact --

18 Q -- one of them is to interface with the
19 press?

20 No. No. It's not an policies during
21 clearing the office about that, you know, really
22 -- the communications director, Chief of Staff,

1 the congressman, are the only people that should
2 be talking to the press. And then the Chuck
3 situation, his original representation was not as
4 a member of press. It was as a like constituent
5 -- it's kind of morphed into him writing articles
6 and becoming a member of the press at that point.

7 And -- so, yeah, the original thing was
8 just same as a constituent, and, quite frankly,
9 you know, his motivation, again, he had some
10 concerns, he wanted to, you know, be the
11 congressman about international concerns, China,
12 you know, Russia, had a really good background and
13 those types of issues. But then, that also
14 morphed into more his idea that I really liked to
15 sit down and helped the congressman do a better
16 job of -- of standing up for conservative values.

17 And he's on the same committee as AOC
18 and Maxine Waters, the Financial Services
19 Committee and Chuck's idea was he should be going
20 after those folks all the time and given his
21 background, you know, as a -- as a Hispanic
22 himself, you know, he couldn't be -- he could

1 consider himself a minority, if you will. And so
2 nobody could say he was this white guy going after
3 women of color or other ethnic origin, that type
4 of thing. And his idea was, you know, you got
5 this bully pulpit, you should use it and you
6 should, you know, dress better.

7 His background in TV, you should make
8 your appearances, you know, he was saying, I went
9 to help him do a better job of doing his job. And
10 they just, you know, turned the deaf ear to all of
11 that stuff. My -- my words to, like, Lynn Hatcher
12 and others, [Former Staffer 1], was, you know, if he would just
13 meet with this guy, I don't think he's a type of
14 guy that would, you know, after you met with him
15 and maybe you might like, you know, I mean, they
16 -- he brings a lot of things to the table that --
17 some expertise that maybe helpful. He's not
18 wanted to get paid for anything.

19 I don't want to be paid for anything. I
20 just want be, you know, help this guy do his job,
21 you know. That was his kind of mindset. So
22 whatever reason that never came to fruition and I

1 could say, my last contact with Chuck was just try
2 to encourage him to cease and desist, if you will.

3 Q Okay. So you said last contact was
4 about two months ago. Can --

5 A Yeah, give or take. Yeah.

6 Q Do you recall the -- the first time you
7 spoke to him?

8 A I think our first meeting --

9 Q Like when that was.

10 A It was like a meeting request and I
11 think it was March of this year. And I did set
12 something up for -- for him to also meet with
13 senator Capito's office as well. So we had a
14 joint meeting in our offices here in Martinsburg
15 to have, you know, that again, was more on the
16 international side of things and that was kind of
17 the initial point of a conversation, like I say,
18 then they kind of morphed into this more, I can be
19 a help to the congressman, help him do a better
20 job. That's appearance and sort of rhetoric and
21 everything.

22 Q And then I think at some point,

1 obviously Mr. Hough and Representative Mooney
2 became aware of Chuck -- or Mr. de Caro, weren't
3 happy with those interactions and -- and they
4 warned staff off of speaking to Mr. de Caro; is
5 that right?

6 A Right -- right.

7 Q Okay. And when do you -- do you recall
8 when that happened?

9 A That would probably be June of this
10 year. And I did have conversations with Mr. de
11 Caro after that. Quite frankly, I did not contact
12 him. He contacted me on my personal cell phone.
13 And so those conversations were response to him
14 calling me.

15 Q Okay. And do -- were Mike -- Mike Hough
16 and Representative Mooney were in those
17 conversations?

18 A I don't know about specific -- the
19 specific conversations, but I think in general
20 they were aware that I had talked with him and at
21 some point they -- they came back to me and said,
22 look, like you really just need to quit talking to

1 this guy. And so I did. You know, and he I
2 again, like I said my last conversation was more
3 of Chuck you just need to cease and desist.
4 You're not -- this is not going to go anywhere.

5 And, you know, let's -- let's, you know,
6 hopefully damage has already been done -- done and
7 -- and anymore damage would not be helpful to the
8 cause, so to speak. If you're really a
9 conservative guy and want to see conservative
10 things happen, you're going after the one true
11 conservative in the West Virginia delegation that
12 really sort of stands for conservative values and
13 so forth. So that was my -- that was my message
14 to Chuck, in the last time I talked to him.

15 MR. QUINN: Okay. I want to understand
16 a little bit. I'll -- I'll preface some of these
17 questions with saying I understand this can be
18 sensitive issues, particularly for you since
19 you're still on Representative Mooney's office.
20 So if -- if anything we've talked about today --
21 so I'll preface that with, if anything, we talked
22 about today is particularly sensitive for you, I

1 hadn't explained before, but when witnesses
2 cooperate we itemize their names and reports --
3 actually can -- can we go off the record for one
4 second while I just explained that?

5 THE REPORTER: Off the record about
6 11:38 a.m.

7 (Whereupon, a discussion was held off
8 the record.)

9 THE REPORTER: Back on the record, 11:40
10 a.m.

11 BY MR. QUINN:

12 Q So I wanted to ask, you know, I know you
13 said that there at some point, was a warning to
14 stop not to talk to Chuck. And that's all of your
15 conversations with Chuck continued after that? It
16 sounds like maybe Mike and Representative Mooney
17 were generally aware that you were in contact with
18 him, but maybe not, you know, appraised of the
19 specifics of your conversation?

20 A Right.

21 Q Does that sound about accurate?

22 A Yeah. I don't know after how much

1 awareness they had or didn't have, but, you know
2 my motivation was again, kind of twofold, well,
3 threefold. I was trying to look out after his
4 mother a little bit because I knew she was still
5 in contact with him to some level, or was planning
6 to be. And so I was trying to be sort of a
7 guardian of her, if you will, on case she needed
8 any help, guidance, that type of thing. And then,
9 again, I was also concerned about the nature of
10 the articles, that they were hostile in nature and
11 that they were doing damage.

12 I was trying to, at the end, like I say,
13 especially trying to encourage him to kind of just
14 turn off the spigot it so to speak, You know,
15 basically asking where it's just going to go. You
16 know, you -- you had your fun and you -- you kind
17 of, you know, made light at some things and saying
18 but at the end of the day, where is this going to
19 go? What's -- what's your goal here and you
20 really want to maintain sort of having somebody
21 with some real solid conservative values, then
22 you're really kind of going after the wrong guy,

1 you know, that type of things.

2 So again, I don't know what really
3 happened to her or what his motivation was to stop
4 and whether he will continue at some point in the
5 future. I don't know. I have no idea. But that
6 was the extent of it.

7 And I guess, and the third thing, quite
8 frankly, and I was at the August 2nd lunch and we
9 talked about Chuck in Moorfield, and, you know,
10 both the congressman and his wife were both like,
11 Oh, we've seen people like this before, and we
12 just did not even talk with them. And I'd hoped
13 that they would actually -- I thought there was
14 somebody to talk about, except both, just from
15 getting him to be more cooperative, but also there
16 could be some things they could learn from him
17 given his past background and TV and -- and he was
18 a Screen Actors Guild member.

19 He was a consultant to JAG and NCIS
20 television shows and had some expertise that they
21 kind of overlooked, I think, or didn't want to
22 factor into the equation. I was just trying to be

1 helpful to the member and -- and I really thought
2 that the end of the day there -- there could be
3 some things that might be some benefits that he
4 could offer, but I cannot -- that was not
5 something they thought and so ultimately that's
6 their call to make.

7 Q Okay. Do you know was the congressman
8 aware that his mother and Chuck --

9 A Yeah.

10 Q -- were having conversations?

11 A Yeah. And they were both -- him
12 especially, he was very direct to his mother
13 about, you know, not talking to him.

14 Q Okay. And then we've talked about how
15 you piece together or it's your opinion that Chuck
16 was also talking to [Former Staffer 6] --

17 A Yeah.

18 Q And -- and -- and you talked about
19 basically sort of an investigation or an internal
20 investigation that maybe like and the congressman
21 did to figure out who was talking to Chuck. Can
22 you -- can you tell me what you know about that --

1 that process or that situation?

2 A You know, I don't know much about it
3 except that they were -- they were basically going
4 through, you know, staff, official e-mails and --
5 and -- and sort of correspondence things.

6 Their original assumption was that they
7 had been hacked, you know, and I -- I doubted that
8 was very much the case because, and I don't know
9 Chuck super well, but I know him well enough to --
10 to relay thing that -- that was not something in
11 his own way, he's a man of integrity, too, and I
12 would never think he would stoop to that level of
13 -- of -- and I don't know that he had the
14 expertise to do it quite frankly, but, again, I
15 think that was their original assumption.

16 And then once they started going through
17 and kind of did the internal investigation and
18 found out what [Former Staffer 6] was doing, they realized
19 that, you know, he was the leak, so to speak.

20 Q Okay. So I wanted to ask since -- since
21 you were in conversation with Mr. de Caro and some
22 of those conversations were after staff had been

1 warned not to talk to him. And I guess you
2 understood that they were sort of doing an
3 investigation to under -- to figure out where the
4 leaks were coming from. Did you have any concern
5 that you were going to be, you know, kind of swept
6 up in that or -- or that they might say that you
7 were the source of those leaks.

8 A I mean, you know, that crosses your
9 mind. I mean, I know I had nothing -- I didn't
10 feel like I had anything to hide that's why I
11 think I'm with you today, too, quite frankly, I --
12 I don't -- my motives in this whole process to try
13 and be of help to the congressman, not to harm
14 him. And so -- and -- and to help his mother as
15 well as who I genuinely like and who, I think an
16 awful a lot of, you know, so like I say my -- my
17 motivations I -- I guess they were multiple
18 motivations, if you will, in the whole process.

19 In that dialogue. I don't -- I don't
20 know that I talked to Chuck Mr. de Caro after I
21 knew there was an internal investigation going on,
22 I just -- those time frames were very close

1 together. That internal investigation didn't
2 start until in the late July, the earliest would
3 be my guess. I'd have to look back and see
4 precisely, but that sounds about right.

5 Q Okay. And I don't want you to speculate
6 too much, so just let me know if you don't have an
7 answer to this, but you -- you described that you
8 weren't too concerned about the investigation
9 because you knew your motivations and -- and felt
10 like your conversations with Mr. de Caro were kind
11 of in Representative Mooney's interest
12 understanding that it appears [Former Staffer 6] was let go
13 because of his communications with Chuck, how do
14 you think they were different? Do you think his
15 -- his motivation was different or --

16 A Oh, yeah. No -- no. I think there was a
17 purposeful intent on his part to -- to feed
18 information to Mr. de Caro that was used in those
19 articles to, I guess, inflict pain/damage on the
20 congressman and Mike and everybody else, you know,
21 so in that, his motivation I would think is -- is
22 almost a 180 from mine as to -- and why he

1 wanted to -- why he did that, I -- I have no clue.

2 [Former Staffer 6] was -- is a bright young man. I think the
3 congressman genuinely liked him. I think Michael
4 genuinely liked him.

5 And why he saw fit to kind of, sort of
6 feed that process is beyond my ability to
7 comprehend that, if you will. You know, And I
8 would -- I would offer that there's two shots. I
9 -- there was -- I had a legitimate concern, you
10 know, I mean, I -- I -- I know my -- in my own
11 heart what it was, but their interpretation of
12 what I was doing at some point I, you know, I
13 said, you know, who knows, you know, at the end of
14 the day I can, you know, if it came -- came to,
15 like, was my head held -- help -- head-held high,
16 so to speak.

17 But I certainly didn't know the
18 interpretation Michael or the congressman might
19 make in that regard as well so --

20 Q Okay. Did -- did you end up ever
21 having, as a result of that investigation, did you
22 ever end up having a conversation with Mike or the

1 representative that was sort of, you know, like
2 Come to Jesus moment about communications with
3 Chuck, did they say like, Hey, you need a cut --
4 you need to cut communication --

5 A Yeah. No. Yeah, I mean, I tried to be
6 upfront with them. I'm sorry. I talk over you
7 again, I apologize. I -- I tried to be upfront
8 with them as much as I could. Like I say, at that
9 -- at that August 2nd lunch, you know, we did talk
10 about some -- to some degree, and I -- I -- I'm
11 almost a hundred percent sure I have not talk with
12 Chuck after that lunch. And so, yeah, I mean, no,
13 they -- they just had a different interpretation
14 of him and who he was and, you know, at -- at the
15 end of day it was all who made their call as to
16 whether or not to -- to use him.

17 Like I said, my attitude was you could
18 have avoided all of these issues and problems with
19 him had you just taken the time to -- to meet with
20 him and -- and perhaps and -- and again, whether
21 or not they would have ever taken him up on his
22 offer to help I'd have no idea, probably not. But

1 at least meeting with the guy and giving him a
2 sort of chance to offer some guidance and
3 direction I think whether, you know, spend a half
4 hour, go have coffee with him in Harpers Ferry or
5 something, you know, but --

6 Q Right.

7 A -- they didn't see fit to do that.

8 Q Okay. And -- and then focusing again a
9 little bit on -- on [Former Staffer 6], we, as I sort of just
10 explained to you, keep witnesses anonymous and --
11 and don't disclose who we talk to and -- and don't
12 talk to.

13 So I'm not making any representations
14 about whether or not we have talked to [Former Staffer 6] but
15 of our understanding from Representative Mooney
16 and his counsel is that they are concerned about
17 our perception of -- of [Former Staffer 6] firing and have
18 explained to us why -- why [Former Staffer 6] was let go and
19 -- and in that process, have -- have essentially
20 made the argument to the -- the OCE that they
21 believed [Former Staffer 6] spoke to the OCE and that that is
22 not the reason that they -- that they let him go.

1 Have you heard anything about those
2 sorts of concerns that part of the [Former Staffer 6]
3 departure had to do --

4 Q No.

5 A -- with his involvement with OCE?

6 A No. I -- they -- really until your
7 request to interview me, I never even made the
8 connection that [Former Staffer 6] and you already had talked
9 or may have talked and that I certainly had no
10 inclination or -- or that even the slightest
11 motivation in his dismissal had to do with any
12 conversations he had with your all's office. No.

13 Q Okay. Are there -- are there any other
14 members of the press that -- that you've had
15 communications with other than to Chuck de Caro to
16 the extent that we're going to call -- try to call
17 a member of the press?

18 A Right. Exactly, I know. It's kind of a
19 --

20 Q Any -- any --

21 A -- I have not that I can -- that I can
22 recall. I mean, I've been to a few events where

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

98

1 I've had a photograph taken and, you know, or had
2 some remarks said at an event where maybe some
3 things talked about that I said like in a letter
4 or something from the congressman but had as to
5 being interviewed or having conversations with or
6 anything like that, no.

7 Q Okay. And then how about in the process
8 of that internal investigation, did you hear about
9 either [Former Staffer 6] or any other staffers speaking to
10 any other members of the press?

11 A No. No.

12 Q And then how about anybody else talking
13 to Mr. de Caro? Any other staff members other
14 than you and [Former Staffer 6]?

15 A Not -- let me think. I did not -- I
16 mean, [Former Staffer 2] talked to him initially, I believe as
17 far as the scheduling requests and I don't even
18 know if that's accurate or not, but I think that's
19 true. But aside from that, I -- I don't know of
20 anybody else on-staff that aside from answering a
21 phone call or something like that would have --
22 [Current Staffer 1] may have. No, but I think [Current Staffer 1] may have

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

99

1 -- he may have contacted [Current Staffer 1] or something, but
2 I think that was very minimal --

3 Q Yes.

4 A -- but going to say other than that, I
5 don't know of anybody.

6 Q Okay. I think we're almost done, just
7 looking through some of my notes. I'm making sure
8 I didn't miss anything.

9 One thing I'll ask you, going back to
10 talking about the first review and collecting
11 documents and information, I -- I know we talked
12 about [Former Staffer 1] involvement in that process and
13 [Former Staffer 2] and I think [Former Staffer 3] to some extent, and did
14 -- did you ever have any conversations with them
15 or concerns on your own about whether documents
16 were being collected thoroughly or whether
17 documents were being deleted or withheld from the
18 OCE or tampered with in any way?

19 A Not whatsoever. No.

20 Q Okay. Then last couple of questions for
21 you are just kind of more general questions. Is
22 -- is there anything that we haven't talked about

1 today that you see as a concern that you would
2 want us to be aware of? You know, we've talked
3 about some various trips and using staff for
4 personal errands. Any other issues that -- that
5 you've noticed in your time at Representative
6 Mooney's office that -- that you think we should
7 be aware of?

8 A You know, I -- I think some of those
9 things you're -- you're already aware of, you
10 know. I think staff has always, you know, that
11 I've been around, you know, this place express a
12 little bit of concern of, you know, him just being
13 a little -- I'm trying to think of the right
14 words. I don't -- I don't think it's intentional
15 sort of thing. Just not being thorough and
16 thinking it through how what should be considered
17 an expenditure.

18 I know a couple of times I've ended up
19 eating costs just because he bought some things
20 and I put on -- on my card and he said, Well, just
21 write those off, and I never felt comfortable
22 writing them off, because they seemed more

1 personal in nature than they were sort of
2 legitimate. Like, it was beyond just, you know,
3 buying a loaf of bread at a -- at the -- at the
4 garden market or something that wasn't just for
5 lunch right then that was going to be taken home,
6 you know, that type of thing.

7 You know, it's just kind of gray areas
8 and things, but I just, you know, I -- I -- I
9 always erred on the side of caution on those
10 things and I don't think he necessarily does.
11 I'll just put it that way.

12 Q Okay. Do -- do you have any specific
13 recollections about those sorts of things, that --
14 costs you might have eaten that -- that you think
15 the congressman considered official, but -- but
16 you weren't comfortable with?

17 A Yeah. I mean, I can say I just -- the
18 one thing that always came to my mind was that the
19 Wardensville garden market, this would have been
20 -- it's been a while ago. It was probably -- I
21 don't know whether it was in 2020 or 20 -- it's
22 probably in 2019, maybe. I'm not even remembering

1 when, but it was just -- he bought several items
2 that clearly were for -- I thought for family use
3 and I just wasn't comfortable putting them on my
4 expense report, you know. I can't say I --

5 Q Okay. So -- so you were at -- you were
6 at a grocery store and -- and you had purchased
7 them on your card, but he was taking them --

8 A Yeah, it was actually a --

9 Q -- taking them home?

10 A -- a garden market kind of sort of a
11 thing where they grew there things and they made
12 -- it was like a bakery and, you know, that type
13 of thing and -- and it was a good stop for him to
14 make him say hello to folks and -- and you know,
15 the -- the congressman I mean, you know, the
16 initial report talked about him going to lunch and
17 shaking hands and then claiming that as a campaign
18 expense and -- and, you know, I've seen him do
19 that as far as lunches and stuff.

20 But I've also stopped at the other
21 places spur of the moment. We'll be going
22 somewhere else and, Hey, let's stop here for a

1 second. I want to say hi to folks. And I think
2 he generally enjoys sort of the impromptu visits
3 and likes to -- to get out and sort of take
4 people's temperature as to what's going on and
5 it's, you know, it's not just to write-off for
6 lunch, you know, it's actually, you know, he
7 legitimately likes to hear from folks and just
8 everyday folks. Somebody has to call the office
9 or have a -- have a need, so somebody that's a
10 constituent, Hey, I'm your congressman.

11 What's going on? You know, that type of
12 thing. So I've seen him do that on a number of
13 occasions, so.

14 Q Okay. Just at that -- that line -- the
15 line gets blurred sometimes between the --

16 A Yeah.

17 Q -- official expenditure and personal
18 expenditure?

19 A Oh yeah. Absolutely. Absolutely.

20 Q Okay. And then besides any -- I didn't
21 want to stop you. Was -- were there any other
22 issues that you had in mind?

1 A No, not that comes to mind. I mean, you
2 know, like I say, it's -- at times, I just think
3 there's a general sort of frustration with
4 sometimes how -- he can be a little be little
5 lackadaisical about issues like that and, you
6 know, that's -- at those concerns before.

7 Q Actually you know one thing that -- that
8 has just jogged my -- my memory or something that
9 we -- that I asked you about we looked into in the
10 first review was related to a shed that -- that's
11 at his house that was built with --

12 A Yeah .

13 Q -- with campaign money. Do you know
14 anything about that shed or -- or how that's used?

15 A No. No.

16 Q No?

17 A Yeah.

18 Q Okay. And then aside from any
19 particular issues, are there any individual that
20 you think would be particularly knowledgeable
21 about the stuff that we talked about today that
22 you think that we should -- we should talk to?

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

105

1 A Yeah, I mean, you know, I -- I have
2 mentioned Rainer's name before, and I hate to
3 bring him into it, because I know he's an older
4 gentleman and this is going to -- it -- it'll be
5 hard -- it's hard on him, you know, just
6 emotionally, I think, to have to go through
7 something like this, but obviously he's done a lot
8 of work for the congressman in the past and has --
9 has been a friend as well as an employee, you
10 know, and.

11 You know, [Current Staffer 1], in the Charleston
12 office is somebody that's helped the congressman
13 on occasion with -- with staffing him and stuff,
14 you know, but other than that, really can't think
15 of anybody that would be beyond who we've talked
16 about and everything already so.

17 Q Okay. Okay and so you think Rainer and
18 [Current Staffer 1] would be knowledgeable on the issue of --
19 of personal errands?

20 A I don't know about [Current Staffer 1] so much in the
21 personal side of things, you know, but just
22 knowing that [Current Staffer 1] has been with the congressman

1 on several occasions, he may be somebody that can
2 offer some insight.

3 MR. QUINN: Okay. Then I think with
4 that, I'm sorry that we went longer than we
5 originally anticipated, but I think with that,
6 that's all the questions that I have.

7 THE WITNESS: Okay.

8 MR. QUINN: Unless, Annie, are you --
9 Annie, are you thinking of anything else that I
10 might have missed and that we should talk about?

11 MS. CHO: I think you covered it all.

12 MR. QUINN: Okay. Great. Well then,
13 I'll reiterate. Thank you very much for -- for
14 your time. I'm sure you're busy and so we really
15 appreciate you taking the time to answer our
16 questions and I think we we'll be out of your hair
17 now. So if -- if you don't have anything else for
18 me or any questions, then we can go ahead and go
19 off the record.

20 THE WITNESS: Yeah. Not -- not at this
21 moment, Sean. I appreciate it. Thanks for your
22 -- I know you're doing your job and being a

Transcript of Interview of Current Staffer 2
Conducted on October 1, 2021

107

1 professional but I also appreciate that.

2 MR. QUINN: Okay. Great. Thank you
3 very much, Current Staffer 2. Kevin, we can go ahead and go off
4 the record.

5 THE REPORTER: Off the record 12:03 p.m.

6 (Off the record at 12:03 p.m.)
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1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

2 I, KEVIN KISER, the officer
3 before whom the foregoing deposition was taken, do
4 hereby certify that said proceedings were
5 electronically recorded by me; and that I am
6 neither counsel for, related to, nor employed by
7 any of the parties to this case and have no
8 interest, financial or otherwise, in its outcome.

9 IN WITNESS WHEREOF, I have hereunto set
10 my hand and affixed my notarial seal this 8th day
11 of October, 2021.

12
13
14 Notary Registration No.: 7637508

15 My Commission Expires: 9/30/2024
16

17 
18 _____

19 KEVIN KISER, NOTARY PUBLIC,
20 FOR THE COMMONWEALTH OF VIRGINIA
21
22

CERTIFICATION OF TRANSCRIPT

I, Andrew Hatziyannis, do hereby certify that the foregoing transcript, to the best of my ability, knowledge, and belief, is a true and correct record of the proceedings; that said proceedings were reduced to typewriting under my supervision; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.



Andrew Hatziyannis
Planet Depos, LLC
October 8, 2021

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

ERRATA SHEET

Page	Line	Correction	Reason
8	22	Mooney not Moody	spelling
9	12	add "staff"	not included in text
10	2	Mooney not Moody	spelling
10	10	Liaison not "to gaze on"	incorrect
10	18	drop of	should not be included
12	3	no not know	incorrect spelling
13	21	parades not I prayed	incorrect
14	1	my not your	incorrect
15	16	Ranier Kissel not Ryan Castle	incorrect
16	4	side not site	incorrect
20	6	████ not added	incorrect
50	21	a few not two	incorrect
51	5	visit not list	incorrect
51	6/7	add "to the Cannan Valley Resort"	correction
53	21	office not officer	incorrect
55	20	for not to	incorrect

This errata sheet is submitted subject to 18 U.S.C. § 1001 (commonly known as the False Statements Act).

Witness Name:

Witness Signature:

Date:

11-19-21

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

ERRATA SHEET

Page	Line	Correction	Reason
54	1	congressman's not congresswoman	incorrect
56	9	Martinsburg	incorrect
58	9	Mansell not Mansdowne	incorrect
64	4	add "each direction"	to clarify
69	12	Johnson not Livingston	incorrect
71	6	Lynn not Lauren	incorrect
75	13	process not protest	incorrect
78	1	sentence not clear	not sure what was being said
79	16	anything not everything	incorrect
82	4	member not matter	incorrect
83	5	pulpit not pump	incorrect
83	11	Lynn, [REDACTED] not Glen Chick	incorrect
84	19	a not at	incorrect
88	5/6	delete "I was planning to be"	not sure what was being said
88	14	spiset not speak	incorrect
92	13	to not the	incorrect

This errata sheet is submitted subject to 18 U.S.C. § 1001 (commonly known as the False Statements Act).

Witness Name: _____

Witness Signature: _____

Date: _____

11-19-21

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

ERRATA SHEET

Page	Line	Correction	Reason
94			
93	22	opposite not idea	incorrect
97	15	chuck not Carl	incorrect
98	13	de Caro not Takara	in correct
101	19	Wardensville not Warden's seed	incorrect
102	13	step not stuff	incorrect
102	17	shaking not your	incorrect
102	20	he has not I've	incorrect
104	3	sense not sent	incorrect
104	11	built not filled	incorrect

This errata sheet is submitted subject to 18 U.S.C. § 1001 (commonly known as the False Statements Act).

Witness Name:

Witness Signature:

Date:

11-19-21

EXHIBIT 8

Transcript of Interview of Current Staffer 3

Review No. 21-6998

October 28, 2021

1 OFFICE OF CONGRESSIONAL ETHICS OF THE
2 U.S. HOUSE OF REPRESENTATIVES
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10 Interview of CURRENT STAFFER 3

11 Conducted Virtually

12 October 28, 2021

13 OCE Review Number 21-6998

14 10:01 a.m. EST
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18
19

20 Job No.: 409862

21 Pages: 1 - 78

22 Transcribed by: Jackie Scheer

1 Interview of CURRENT STAFFER 3, conducted
2 virtually.

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7 Pursuant to agreement, before Shaylah Lynn
8 Kiser, Notary Public in and for the Commonwealth of
9 Virginia.

A P P E A R A N C E S

ON BEHALF OF HOUSE OFFICE OF CONGRESSIONAL
ETHICS:

SEAN T. QUINN, ESQUIRE

HELEN EISNER, ESQUIRE

Office of Congressional Ethics

(OCE) of the

U.S. House of Representatives

425 3rd Street, S.W.

Suite 1110

Washington, D.C. 20024

Telephone: (202) 225-9739

ALSO PRESENT:

CARLOS HENLEY, Technician

SHAYLAH LYNN KISER, Reporter

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C O N T E N T S

EXAMINATION OF CURRENT STAFFER 3	PAGE
By Mr. Quinn	5

E X H I B I T S

EXHIBIT	PAGE
A E-mail	21
B E-mail	28
C Letter	32
D E-mail	36
E E-mail	40
F E-mail	50
G E-mail	52

1 P R O C E E D I N G S

2 MR. HENLEY: Ready to go. Mr. Quinn?

3 MR. QUINN: Great. Yes, so just quickly
4 for the record first I'll say that today is
5 October 28th, 2021 and we're conducting the
6 interview of Current Staffer 3 by Zoom. [Current
7 Staffer 3]'s not represented today. Speaking is
8 Sean Quinn. I'm investigative counsel at the
9 Office of Congressional Ethics. And I'm also here
10 with Helen Eisner, who's Deputy Chief Counsel at
11 the OCE. The witness has been given a copy of 18
12 USC 1001 and has also signed the acknowledgment.

13 And, Current Staffer 3, as I said earlier,
14 thanks a lot for your time this morning, really
15 appreciate it. And then also for all the work
16 and time you spent collecting documents for us.
17 It's extremely helpful.

18 And as I mentioned also earlier, happy to
19 take a break whenever you want, just let me know.
20 And then also if at any point in the interview
21 you've got any questions or if you don't understand
22 one of my questions or just need me to reword

1 something, I'm always happy to do that.

2 CURRENT STAFFER 3: Okay. Thank you.

3 BY MR. QUINN:

4 Q So the first thing I just wanted to start
5 with, you sent me an e-mail this morning and
6 mentioned that you were doing some preparation for
7 the interview. And I just kind of wanted to ask
8 what sort of documents did you review, what sort of
9 preparation did you do for today?

10 A Okay. I just looked over the -- what do
11 you call it, the request for information that you'd
12 sent over back in September. As well as my response
13 and -- and the thing -- some of the files that I
14 sent you kind of thing. I just sort of printed some
15 stuff out because I wasn't sure how this process all
16 worked and I'm at home and because I was -- I -- I
17 don't have a -- a place on The Hill that I could do
18 this and since we're in session, I figured it would
19 be better to do it at home. So I just printed some
20 of the documents off, not all of them, of course.
21 Just to be able to have reference to, because I
22 don't know how this is all going to, you know, how

1 we're going to look at things, so.

2 Q Okay. Great. Well, just to reassure
3 you, anything that we need to look at I'll have and
4 we can pull up on the screen.

5 A Okay.

6 Q So that shouldn't be a problem. But then
7 also before we sort of dive -- dive into questions
8 or talking about substantive issues, I just wanted
9 to give you an opportunity. If there's anything in
10 particular that you wanted to talk about today or
11 that you had prepared for in particular, I'm happy
12 to have you flag those issues and -- and -- and make
13 sure that I'm addressing any concerns that -- that
14 you might have independently.

15 A I don't have any I can think of, Sean. I
16 presume this interview is specifically geared toward
17 the request for information for the -- what you sent
18 me in September, correct?

19 Q Correct. Yes.

20 A Because I'm not -- because I -- I knew
21 what the other request for November that you all did
22 and I provided some stuff to the staff for that at

1 that time. But I was not interviewed for that, so
2 I'm just trying to keep this straight in my head so
3 I know where we're going with this -- with all this
4 kind of thing.

5 Q Sure. Yeah, we will mostly talk about
6 the documents that you've produced over the last
7 month or so. I might have a few questions for you
8 just kind of about how you were involved in the
9 first review.

10 A Uh-huh.

11 Q But, you know, if -- if there's something
12 you can't recall or -- or anything like that,
13 just -- just let me know and we can -- we can deal
14 with that. But --

15 A -- okay. Thanks.

16 Q Okay. Well, then if you didn't have
17 anything for me, I -- I think I'll start with just a
18 little bit of background information. If you can
19 tell me what your position with the House is and
20 then just describe your duties generally.

21 A My position with the House is that I'm an
22 office and financial administrator for eight members

1 of congress. Mr. Mooney being one of them. And
2 I've been working there since 1995, been doing
3 shared offices since 1996, '97, I believe, kind of
4 thing. I handle -- some offices I just handle
5 financial things for. Others I do a little bit more
6 for. Office administration being -- managing the
7 office sort of interacting more also with the
8 district office staff. Making sure all of our
9 systems are working properly and things like that.
10 Financially, I'm overseeing the budget, processing
11 invoices, expense reports, payroll stuff, all that
12 kind of thing, so. And then interact with the
13 member and chief of staff heavily in regards to the
14 financial matters.

15 Q And for Representative Mooney's office,
16 do you just handle financial matters or do you have
17 one of those expanded roles?

18 A I have an expanded role now. I was --
19 back in '17 -- let's see, '17 -- I -- I didn't start
20 the expanded role till 2020 with them. They had
21 another person on board who their scheduler, Anita
22 Itnire (phonetic), I believe at the time, she was